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DIRECTORATE

managing employment equity

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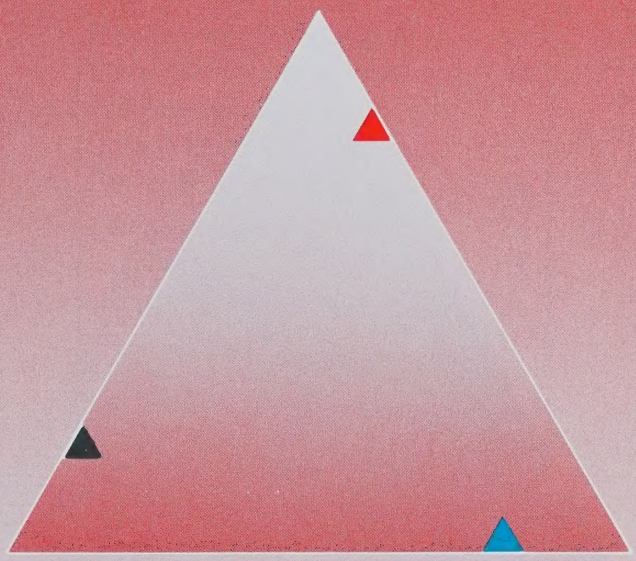
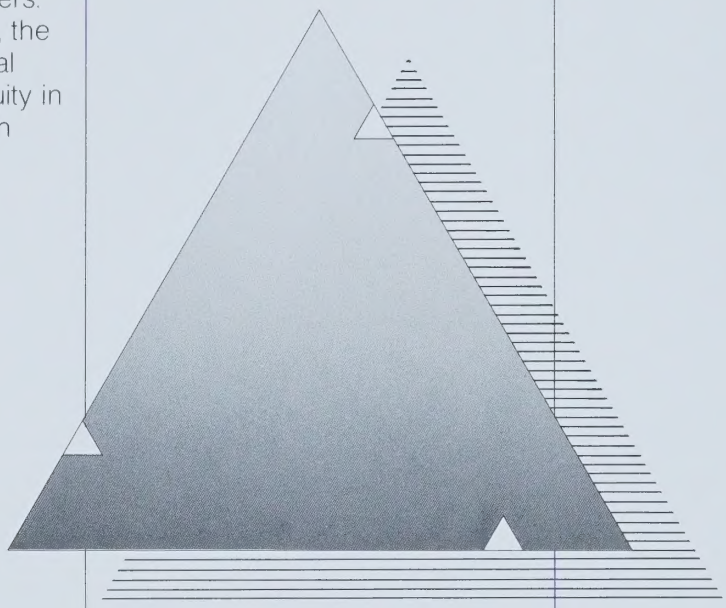


legislation — a guide for employers

Managing Employment Equity

Ontario Women's Directorate

This booklet, **Legislation — A Guide for Employers**, is the fifth in a series of publications on employment equity produced by the Ontario Women's Directorate. The first booklet introduces the series. The second booklet gives an overview of the employment equity management process. The third and fourth booklets, **Organizational Analysis** and **Organizational Change and Impact**, examine the process in more detail. In this booklet, we outline employment and equity legislation for Ontario employers. **Employment Equity Initiatives**, the sixth booklet, looks at practical examples of employment equity in action, from organizations with experience in this field.



Organizational Analysis

The first step in the employment equity management process is organizational analysis — a review of the workplace and the people in it.

Organizational analysis is the foundation stone of the process, for it allows employers to gather all of the pertinent information they will need for the changes that lie ahead.

Organizational Change

The employment equity program — just like any program that results in significant change within an organization — must be handled with care and sensitivity.

It therefore requires careful planning and implementation if it is to be effective, if it is to be successful, and if it is to have a positive impact.

Organizational Impact

All good managers want to be able to assess the impact of change on their organizations.

They must consequently monitor the employment equity process as it moves through each step towards its ultimate goal — a workplace in which people are hired, trained, promoted and paid on the basis of merit alone.

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Introduction

This booklet will help you answer some key questions about equality in employment:

- What employment laws affect you?
- What are the implications of those laws for your organization?
- What are the significant issues that will concern you directly?

The major areas of provincial and federal legislation that are relevant to women in the workplace are the focus of this part of the series on employment equity. This booklet is not meant to provide a comprehensive discussion of the law. Instead, it draws your attention to some of the relevant legislation and government policies that may affect you as an employer of women. At the end of this booklet, you will find sources of further information and a list of resources.

If you have read other booklets in this series, you will already have some information about the legal underpinnings of employment equity in Ontario. You will be aware of the need to consider legal issues when reviewing external factors that can influence your employment equity initiatives.

The Ontario Human Rights Code and the Employment Standards Act are the two key pieces of Ontario provincial legislation examined here. The Charter of Rights and Freedoms, the Canadian Human Rights Act, the Employment Equity Act and related policies designed to promote employment equity in the federal jurisdiction are also discussed.

Some of the legislation outlined here establishes minimum standards of work governing Ontario employers. Other legislation covers the prevention and elimination of discrimination in the workplace, in order to provide fair and equal access to employment opportunities for everyone. This type of legislation recognizes that some people — or groups of people — have been denied such access for reasons that have nothing to do with merit or ability. For this reason, the legislation *does* allow the development of certain programs that attempt to rectify discrimination.

It is not only the individual who benefits from equality in employment. Employers have found that employment equity initiatives make good business sense: they broaden the pool of available talent and increase productivity in the workforce.

'We need equal opportunity to achieve fairness in the process, and employment equity to achieve justice in the outcome.'

Judge Rosalie Abella
Royal Commission Report, "Equality in Employment."

Ontario Human Rights Code

The Ontario Human Rights Code provides every person with a right to freedom from discrimination in the areas of:

- Services, goods and facilities
- Accommodation
- Contracts
- Employment
- Membership in vocational associations and trade unions

The Code is intended to promote "equal treatment with respect to employment," regardless of race, ancestry, place of origin, colour, ethnic origin, citizenship, creed, sex, age, record of offences, marital status, family status, handicap or sexual orientation.

This legislation guarantees freedom from discrimination in employment, including freedom from harassment and from "systemic," or unintentional, discrimination.

Equal Employment Opportunities

The right to "equal treatment" covers all aspects of employment including recruitment, hiring, training, transfer, promotion, apprenticeship terms, dismissal and layoff.

In the area of recruitment, for example, the Code forbids advertising which would discourage a qualified person of a particular race, sex, age and so on from applying for a job. In general, application forms should not request information, directly or indirectly, about any of the prohibited grounds of discrimination. Employment interviews allow more latitude, but employers must be able to show that their questions relate to genuine and reasonable qualifications for the job.

As a general rule in designing application forms or conducting job interviews, employers must ensure that employment decisions are based on the applicant's ability to do the job. Sometimes this involves a review of job requirements, so that assumptions about an applicant's situation do not potentially screen out certain applicants. Instead of asking whether an applicant has or intends to have children, for example, it is appropriate to ask if the applicant is free to travel or to relocate. The Ontario Human Rights Commission's guide, called Employment Application Forms and Interviews, is available from the commission or the Ontario Women's Directorate.

Employers should also remember that it is unlawful, when using employment agencies, to place a job request which classifies or restricts applicants on any of the prohibited grounds. At the same time, employment agencies may not accept such orders.

The provisions of the Code also apply to self-governing professions and trade unions.

Equal Employment Policies and Practices

The right to equal treatment also covers the terms and conditions of employment — including rates of pay, overtime, hours of work, vacation benefits, shift work, discipline and performance evaluation. An employer, for example, may not give the day shift to women workers and assign only men to the night shift.

Freedom from Harassment

Harassment is defined in the Code as "a course of vexatious comment or conduct that is known or ought reasonably to be known to be unwelcome." Employers and co-workers are prohibited from harassing an employee on the basis of the prohibited grounds: race, age, handicap, sexual orientation and so on.

Sexual harassment is also forbidden by the Code. Three types of sexual harassment are defined. The first type is "a course of vexatious comment or conduct that is known or ought reasonably to be known to be unwelcome" on the part of the employer, someone acting for the employer or a co-worker. Unwelcome sexual remarks or physical contact are examples.

The second type of sexual harassment is an unwanted sexual advance made by a person who is able to grant or deny a benefit to another — an advance from a supervisor to an employee, for example.

A third type of prohibited behaviour occurs when a person who is in a position to grant or deny a benefit makes threats against the person who rejects his or her sexual advance, or penalizes the person in any way.

Employers and managers are reminded that under the Code, a person who has the authority to prevent or discourage harassment is considered responsible for failing to exercise that authority. In other words, employers and managers who are aware of harassment situations in the workplace are legally obligated to take action.

Freedom from Systemic Discrimination

"Systemic," "constructive" or "institutional" discrimination are terms used to describe practices which are not openly discriminatory — but nevertheless are discriminatory in effect.

A minimum height and weight requirement for jobs involving physical labour is a classic example of systemic discrimination. Neutral on the surface, this kind of requirement will tend to screen out women, as well as certain races.

Section 10 of the Code provides that where a requirement or qualification such as this results in systemic or constructive discrimination, the requirement or qualification must be a reasonable and *bona fide* one. A recent amendment to this section goes even further. It provides that the Human Rights Commission or a court cannot find a requirement or qualification to be reasonable and *bona fide*, unless it is satisfied that the person being constructively discriminated against cannot be accommodated by the employer without undue hardship. This amendment will likely come into force in 1987.

Other types of systemic discrimination include word-of-mouth hiring, credentialism (requiring degrees or diplomas that are not a necessary requirement of the job), and the requirement of Canadian experience. Information about how to assess personnel policies and practices to ensure that they are free from bias is presented in the booklet in this series entitled Organizational Analysis.

Special Programs

Section 13 of the Code permits special programs, including employment equity or affirmative action programs. Special programs are defined as:

- Programs designed to relieve hardship or economic disadvantage
- Programs designed to assist disadvantaged people to achieve equal opportunity or to help eliminate the kind of discrimination forbidden by the Code

Special programs that promote the hiring and advancement of women or of other disadvantaged groups, such as the disabled or visible minorities, do not contravene the Code. Thus, employers who introduce special programs will be free from charges of reverse discrimination.

The Ontario Human Rights Commission can advise you on whether your program meets the requirements of the Code.

Contract Compliance

Employers should note that contracts with any Ontario government ministry or agency are also covered under the Ontario Human Rights Code. In Section 25, the Code stipulates that no employment discrimination is allowed in the course of performing a contract. Government loans, grants and guarantees also carry this condition. If discrimination is found under the formal complaints procedure of the Human Rights Commission, the contract, loan, grant or guarantee can be cancelled.

Formal Complaint Procedure

The formal complaint procedure and the role of the Human Rights Commission is established under the Human Rights Code. Most complaints are settled early and the complaint process encourages a resolution to the problem and a settlement.

The procedure for processing complaints is, briefly, as follows:

- A complaint is assigned to a human rights officer
- A fact-finding investigation is conducted, including both parties
- The officer meets with the complainant and the respondent. If all parties can agree, the complaint is settled

At this point, many complaints are settled. A public panel of human rights commissioners makes a decision about the formal endorsement of the settlement. If settlement is not reached or the commissioners are not satisfied with the settlement, they can request that the Minister of Labour appoint a board of inquiry, which is an independent, adjudicative body. This board's decision can result in a dismissal of the complaint or an order of compliance. Its decision can be appealed to the Supreme Court of Ontario (Divisional Court).

Employment Standards Act

The Employment Standards Act sets minimum standards for work in Ontario. It regulates:

- Hours of work
- Minimum wage
- Public holidays
- Overtime pay
- Severance pay
- Equal pay for equal work
- Benefit plans
- Pregnancy leave
- Termination notices
- Vacation pay

This booklet examines equal pay for equal work, benefit plans, pregnancy leave and issues that affect domestic workers. For specific information about these or other aspects of the Act, contact the Employment Standards Branch of the Ministry of Labour. You can obtain a guide to the Act from that branch or from the Ontario Women's Directorate.

Equal Pay for Equal Work

Section 33 of the Act states that the rate of pay should be the same for male and female employees performing substantially the same kind of work in the same establishment.

Exceptions are allowed when the difference in rate of pay is due to:

- A seniority system
- A merit system
- A measure of quantity or quality of production (e.g. piecework)
- A differential based on any factor other than sex

Other important provisions of the Act ensure that equal pay applies to both males and females; that employers and employees cannot make an agreement which goes against the equal pay provisions; and that employers cannot reduce the wages of higher paid employees to comply with the equal pay provisions.

How are jobs compared? Jobs are considered substantially the same if their performance requires the same skill, effort and responsibility under similar working conditions. Currently, the law requires that jobs have to be similar *in each and every one* of these characteristics. (Equal pay legislation should not be confused with pay equity legislation, which will measure the value of dissimilar jobs.)

Jobs are compared based on what work is actually done, rather than on what the job description says. Recent legal decisions also indicate that infrequently performed tasks are not relevant in determining whether or not jobs are substantially the same. In addition, jobs with different titles or different training requirements (e.g. hairdresser and barber, nursing assistant and nursing orderly) may still be considered substantially the same if they belong to the same "establishment" — that is, if they are performed for the same employer.

Sometimes two or more locations belonging to the same employer are considered to be the same establishment. This will depend on a number of factors: the distance between locations; collective agreements; personnel policies; and recruitment methods.

Pregnancy Leave

Sections 35 to 39 of the Employment Standards Act outline the pregnancy leave provisions for Ontario.

The key positions are summarized:

- Employees may not be fired for pregnancy
- Employees are entitled to a flexible 17-week unpaid leave of absence
- Employees with one year and 11 weeks of service are eligible for leave
- The leave may begin 11 weeks before the expected date of birth
- Employees can take at least six weeks leave after the actual date of birth
- Employees have the right to return to the same job, or a comparable position, without loss of seniority or benefits and at the salary earned before leaving.
- Outside the pregnancy leave period, pregnant women are entitled to all benefits covering sickness and disability, regardless of whether this is due to complications of pregnancy or other illness

The Employment Standards Act and the Canada Labour Code provide these minimum standards for pregnancy leave. As well, Canada Employment and Immigration, under the Unemployment Insurance Act, provides maternity benefits of 60 per cent of normal earnings (up to a specified maximum) for a period of 15 weeks.

Some employers offer additional benefits. Toronto Hydro, for example, tops up unemployment insurance benefits to 95 per cent of a woman's salary. Unionized employees at General Motors of Canada Limited receive a supplemented income during pregnancy leave, raising their benefits to a level equal to the sickness and accident benefits for all medical leaves of absence. The Federation of Women Teachers' Associations of Ontario provides employees with 10 months fully paid maternity leave.

Benefit Plans

Section 34 of the Act regulates benefit plans. Employers may not differentiate between employees, classes of employees or their survivors or dependents, on the grounds of age, sex or marital status. Benefits covered under the regulations for this Act include:

- Superannuation
- Retirement
- Income replacement
- Disability
- Sickness
- Accident
- Medical, hospital
- Death
- Nursing or dental expenses
- Drug expenses
- Other similar benefits

The issue of benefit coverage in relation to part-time work is particularly relevant to women's employment, since women make up the majority of the part-time workforce. Although benefits for part-time workers are not yet covered under the Act, some collective agreements — teachers' contracts, for example — include negotiated benefits for part-time workers. A bill currently before the Ontario legislature will amend the Pension Benefits Act to provide for shorter vesting periods, pension plan portability and eligibility for part-time workers.

In recognition of the contribution of their part-time workforce, and to enhance the appeal of part-

time work, some employers offer full benefit packages to their part-time employees. London Life Insurance Company is one such employer. Part-time work can be a good way to retain skilled people who require time to fulfill other commitments, such as family responsibilities.

Domestic Workers

In the past few years, domestic workers have received increasing levels of protection under Ontario's labour legislation. Since March 1985, for example, some categories of domestic workers have been entitled to the same minimum wage and overtime protection as other workers in Ontario. Under the Workers' Compensation Act, it is compulsory for employers to contribute to the accident fund to cover domestic workers who work more than 24 hours a week in the employer's home.

A challenge under the equality section of the Charter of Rights and Freedoms was recently launched in order to extend full Employment Standards Act protection to all domestic workers.

Occupational Health and Safety Act

This legislation protects workers from health and safety hazards. It is administered by the Occupational Health and Safety Division of the Ontario Ministry of Labour.

Under the Act, employers and workers share responsibility for identifying hazards and for taking steps to reduce or eliminate them.

There are general provisions in the regulations for this Act that apply to hazardous biological or chemical substances. Special provisions protect women from lead and excessive exposure to mercury. For example:

- Workers who are likely to be exposed to lead in the workplace may be required to undergo periodic tests to guard against lead intoxication. On the advice of a physician, pregnant women may be ordered removed from lead exposure when the lead concentration in their blood exceeds prescribed limits
- Exposure of women of child-bearing age to mercury should be kept to a minimum

For information, contact the Occupational Health and Safety Division of the Ministry of Labour.

Pay Equity Legislation

The Province of Ontario has introduced legislation to establish pay equity in the public and private sectors of Ontario.

At the time of writing of this publication, the Pay Equity Act, (Bill 154) had received second reading in the legislature and had been reviewed by the Justice Committee which recommended that it be reported for third reading. The Pay Equity Act covers all private sector employers with at least 10 employees, as well as the public sector (school boards, municipalities, colleges, universities, hospitals, crown agencies and Ontario Public Service employees).

The purpose of this legislation is to eliminate gender-based pay discrimination in these workplaces.

The Pay Equity Act will require equal pay for jobs of equal value within an employer's establishment. Establishment is defined as all the employer's locations within a county, territorial district or regional municipality.

Job comparisons will be made between female-dominated job classes (60 per cent female) and male-dominated job classes (70 per cent male). They will be based on skill, effort, responsibility and working conditions.

Job comparisons are made only within an employer's establishment. In unionized environments, comparisons will be made first between female and male job classes within the same bargaining unit. If there is no comparable male job class in that unit, the female job classes under evaluation will be compared to male job classes anywhere in the employer's establishment. Similarly, non-unionized job classes will be compared, and only when no male job class is found will the comparison be made to job classes in a bargaining unit.

Methods of comparing jobs are left to the employers or, in the case of unionized workplaces, to the employer and bargaining agents. Pay equity plans will be posted in the workplace. If pay equity issues can be resolved within the workplace, no government involvement will be necessary.

Differences in compensation resulting from formal seniority systems, temporary training assignments, merit pay, red circling and skill shortages will be allowed.

Following proclamation of Bill 154, pay equity will be phased in over a six-year period — the length of time depending upon the size and nature of the employer. The public sector will be the first to implement; private sector companies will follow.

Wage adjustments may be limited to one per cent of the employer's payroll for the previous year.

Bill 154 establishes a Pay Equity Commission to resolve complaints and administer the legislation. The commission will also provide educational materials and guidance on how to comply with the Act, and how to examine evaluation systems for gender bias.

Federal Jurisdiction

Federal legislation and related programs also affect Ontario employers.

Canadian Charter of Rights and Freedoms

The Canadian Charter of Rights and Freedoms protects all Canadians. It guarantees, in Section 1, "the rights and freedoms set out in it subject only to such reasonable limits prescribed by law as can be demonstrably justified in a free and democratic society." Section 15, which came into force on April 17, 1985, states:

> 15 (1) Every individual is equal before and under the law and has the right to equal protection and equal benefit of the law without discrimination and, in particular, without discrimination based on race, national or ethnic origin, colour, religion, sex, age or mental or physical disability.
>
> (2) Subsection (1) does not preclude any law, program or activity that has as its object the amelioration of conditions of disadvantaged individuals or groups including those that are disadvantaged because of race, national or ethnic origin, colour, religion, sex, age or mental or physical disability.

Challenges under Section 15 of the Charter will provide employers and employees with an opportunity to test legislated employment standards on the basis that these laws infringe on the guarantees of equality provided in the Charter. Discrimination will only be permissible if the particular law program or activity is in the nature of a special program to better the condition of a previously disadvantaged group, or the law is demonstrably justified in a free and democratic society. Clearly the courts will now provide an important role in protecting all Canadians in the workplace.

Canadian Human Rights Act

The Canadian Human Rights Act affects federally regulated employers and employees, including federal departments, crown corporations, and federally regulated private companies. Like the Ontario Human Rights Code, the federal Act aims to resolve specific disputes among individuals, including complaints of employment discrimination.

Section 10 of the Act prohibits systemic discrimination; Section 15 permits special programs such as employment equity; Section 11 requires men and women doing work of equal value in the same establishment to be paid equally.

The Canadian Human Rights Commission now has the responsibility of enforcing the federal Employment Equity Act, 1986.

Federal Employment Equity Program

The federal government has implemented a comprehensive, three-part employment equity program: the Employment Equity Act; the Treasury Board Policy; and a contract compliance program. It targets four groups:

- Women
- Visible minorities
- Persons with disabilities
- Aboriginal peoples

Employment Equity Act

This legislation affects all federally regulated employers with more than 100 employees. It was proclaimed on August 13, 1986. Employers are required to submit statistical reports on their workforce, including the designated groups' representation in occupational groups, salary ranges, and numbers hired, terminated and promoted. The first report must be filed on June 1, 1988, and annually thereafter.

The report will be filed with Employment and Immigration Canada and a consolidated report will be tabled in Parliament and made available to the public and the Canadian Human Rights Commission. Employers who do not report are subject to a maximum fine of $50,000. The Human Rights Commission may investigate if a complaint is received or if statistical reports indicate systemic discrimination.

Employers are also required to prepare an annual employment equity action plan which must meet specific requirements. A copy of the plan must be kept by the employer for three years and made available to the Canadian Human Rights Commission.

Treasury Board Policy

Treasury Board Policies affect federal crown corporations and federal government departments. Federal crown corporations must meet the requirements of the Employment Equity Act. In addi-

tion, the Treasury Board requires them to submit a three-year action plan to the Treasury Board and to report annually on their progress.

Crown corporations with fewer than 100 employees must report annually on the representation and distribution of the designated groups in their workforce. The Treasury Board policy is expected to affect approximately 50 crown corporations, including about 200,000 crown employees. In addition, federal government departments and agencies are required to submit three-year action plans to the Treasury Board, which will monitor the plans to ensure that identified goals are met.

Contract Compliance Program for Federal Contractors

Suppliers of goods and services who employ 100 or more people and who wish to bid on contracts of $200,000 or more from the federal government will be required to certify in writing their commitment to implement employment equity, according to criteria established by Employment and Immigration Canada. Failure to comply could prevent these suppliers from bidding on future contracts.

For further information on these federal programs, contact Employment and Immigration Canada. See the list of resources at the back of this booklet.

City of Toronto

Toronto City Council has approved a contract compliance program which goes into effect in July 1987. All suppliers of goods and services, all grant recipients and the 25 civic agencies will be required to sign and post a non-discrimination policy and supply the city with annual workforce data — including salaries and wages — for all designated groups. (The council's designated groups are women, visible minorities and people with disabilities.) The city will monitor and evaluate the results of the first two years of the program before deciding whether additional measures are necessary.

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Resources

Ontario Women's Directorate
Consultative Services Branch

The Ontario Women's Directorate is the agency in the Ontario government that co-ordinates the devlopment and communication of programs and policies for women. Its aim is economic and social equality for women in Ontario.

The Consultative Services Branch of the directorate specializes in the area of employment equity. It is responsible for encouraging the planning, development and expansion of employment equity programs in Ontario's public and private sectors.

In order to achieve this goal, the branch provides a wide range of consulting services to employers who are either just beginning to initiate employment equity programs, or who wish to enlarge those that are already established. Consultants offer employment equity strategies that are tailored to the organization's particular environment.

For further information, contact: The Consultative Services Branch
Ontario Women's Directorate
4th Floor, Mowat Block
900 Bay Street
Toronto, Ontario M6A 1C2
(416) 965-7785

For more information on the Ontario Human Rights Code, the Employment Standards Act and the Occupational Health and Safety Act, contact the Ontario Ministry of Labour offices in the following cities:

Hamilton
119 King St. W.
L8N 3Z9
(416) 527-7736

Kenora
808 Robertson St.
P9N 1X9
(807) 468-3128

Kingston
1055 Princess St.
K7L 1H3
(613) 547-3414

Kitchener
824 King St. W.
N2G 1G1
(519) 744-8101

London
205 Oxford St. E.
N6A 5G6
(519) 439-3231

Mississauga
2 Robert Speck Pkwy.
L4Z 1H8
(416) 273-7811

Ottawa
2197 Riverside Dr.
K1H 7X3
(613) 523-7530

Sault Ste. Marie
390 Bay St.
P6A 1X2
(705) 949-3331

St. Catharines
205 King St.
L2R 3J5
(416) 682-7261

Scarborough
2500 Lawrence Ave. E.
M1P 2R7
(416) 750-3575

Sudbury
199 Larch St.
P3E 5P9
(705) 675-4455

Thunder Bay
435 James St. S.
P7E 6E3
(807) 475-1691

Timmins
273 3rd Ave.
P4N 1E2
(705) 267-6231

Toronto
400 University Ave.
M7A 1T7

Human Rights:
(416) 965-6841

Employment Standards
(416) 965-5251

Occupational Health and Safety
(416) 965-7941

Windsor
500 Ouellette Ave.
N9A 1B3
(519) 256-8278

For more information on the Canadian Human Rights Act, the Employment Equity Act and the Federal Contractors Program, contact these offices:

Canadian Human Rights Commission
Ontario Region
Arthur Meighen Building
55 St. Clair Ave. E.
6th Floor
Toronto, Ontario
M4T 1M2
(416) 973-5527

Employment and Immigration Canada
Chief, Employment Equity
264 Adelaide St. E.
Main Floor
Toronto, Ontario
M5A 1N1
(416) 973-3755

Employment and Immigration Canada
Director, Federal Contractors Program
Employment Equity Branch
Ottawa, Ontario
K1A 0J9
(819) 994-4655

For more information about the City of Toronto's Contract Compliance Program, contact:

Contract Compliance Program
Management Services Dept.
2nd Floor, West Tower
Toronto City Hall
Toronto, Ontario
M5H 2N2
(416) 392-6806

Publications in this Series

Managing Employment Equity

- Introduction to a Series
- An Overview
- Organizational Analysis
- Organizational Change and Impact
- Legislation — A Guide for Employers
- Employment Equity Initiatives

Ontario Women's Directorate

Honourable Ian Scott
Attorney General and
Minister Responsible
for Women's Issues

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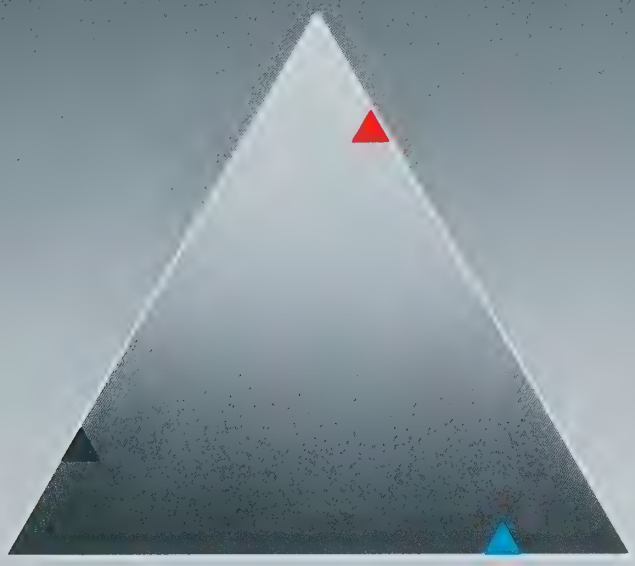

introduction to a series

Managing Employment Equity

Ontario Women's Directorate

This is the first in a six-part series of publications on employment equity produced by the Ontario Women's Directorate. In this booklet, the issue of employment equity is defined. The second booklet gives an overview of the employment equity management process. The third booklet, entitled **Organizational Analysis**, begins a more detailed look at the process. In the fourth booklet, **Organizational Change and Impact**, the examination of the process is completed. The fifth booklet is entitled **Legislation — A Guide For Employers**. **Employment Equity Initiatives**, the sixth booklet, features practical examples and ideas from organizations with experience in the employment equity field.

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The first step in the employment equity management process is organizational analysis — a review of the workplace and the people in it.

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Acknowledgments

The Ontario Women's Directorate gratefully acknowledges the contributions of the representatives of the many business and labour organizations who helped produce this series.

Introduction

Employment equity is becoming a familiar term in Ontario's business community. The need to offer equal opportunity in the workplace is now being recognized as a priority by many employers across the province.

The term "employment equity" was coined by Judge Rosalie Abella in her 1984 Royal Commission report Equality in Employment. It covers a broad range of measures to improve the status of certain members of designated groups: women, people with disabilities, native people, immigrants and visible minorities. This series of booklets on employment equity has been developed by the Ontario Women's Directorate and focuses on women specifically. The management process outlined, however, can be adapted to all designated groups. (The Ontario government provides guidance to employers on programs for these groups. See the resources listed at the back of this brochure.)

The growing numbers of women in the workforce offer a pool of talent and potential that employers cannot afford to overlook. By following the employment equity management process outlined in this series, employers will learn how they can examine changing ideas and priorities — and adapt to them. They will discover that the process is flexible — that it recognizes different corporate cultures. And, finally, employers will see that their own approaches to employment equity can be varied, creative and dynamic.

In other words, the employment equity management process outlined in this series will be a valuable tool for the examination, review and updating of human resources systems to ensure fair and effective people management.

This series is a six-part guide to the program, outlining how to introduce employment equity into an organization, and how to ensure that it is maintained. The series provides employers with:

- An overview of the employment equity management process
- Directions for starting it
- Tools for analysis
- A framework for assessing policies and practices
- Options for developing corporate strategies
- Guidelines on employment legislation
- Examples of employment equity in action

'Making the principle of employment equity an integral part of this corporate culture is one of our top priorities. It's a principle whose time has come and it's in line with the way we want things done at the Region of Peel.'

Frank Bean
Chairman
Region of Peel

Women in the Workforce

Over 44 per cent of Canada's current labour force is made up of women. By the year 2000, women's participation in the workforce is expected to match men's. The average woman works a total of 30 to 45 years.

This group, therefore, represents an enormous resource for employers. At the same time, there is strong evidence to indicate that women are underutilized in the workplace.

Five hundred occupations are listed by Census Canada. Female employees are concentrated in just 20 of these occupations. In general, their jobs are limited to the sales, service and clerical areas of industry — and all of these positions tend to be low-paid, with low status and minimal opportunity for advancement.

The gap between men's and women's earnings provides a further illustration of women's unequal position. In fact, in six years this gap did not significantly change. In 1979, Ontario women's average full-time earnings, as a percentage of men's, were 63.5 per cent. In 1985, in Ontario they were 62.9 per cent.

Many employers are recognizing, however, that women present an untapped reservoir of talent and skills. Female employees are being encouraged to transfer to non-traditional occupations. Human resources staffs are making decisions that will allow both current and prospective employees to develop and challenge their potential. Women employees are demonstrating new abilities and accepting new opportunities. As a result, employers are acquiring a renewed competitive edge.

These advances are not taking place overnight, however, and they do not happen simply because employers agree with the philosophy of employment equity. Positive changes are the result of specific actions employers are taking to improve the role of women in their organizations. By examining their policies and practices and taking steps to change them, where necessary, employers are moving women ahead and achieving measurable progress.

The government of Ontario supports a number of policies and programs that work towards the goal of economic equality. They include:

- Training strategies
- Child-care policies
- Employment equity
- Pay equity

As the private and public sectors move forward on this issue, with the government continuing to support such efforts, women will reach their goal of equality — and the workplace, ultimately, will be vastly improved.

Breaking Down the Barriers

Employment equity aims to remove those workplace barriers that prevent women from achieving their full potential. The goal of employment equity is to hire and promote people on the basis of competence only. Discrimination against women, whether intentional or unintentional, has a negative impact on their positions as employees.

The barriers that confront women most often consist of employment policies and practices that exclude them from participating as equals "on the job." They shut women out of career advancement, limit their earnings and confine them to dead-end jobs. Their potential to contribute to the organization and develop their skills is consequently thwarted.

The majority of employers agree with the concept of employment equity and believe in equal access to opportunity. They may be convinced that there is no discrimination against women in their own organizations. Yet the women who work for these employers often disagree.

The beliefs they hold about opportunities and advancements in their workplaces can differ dramatically from those of their employers — and those of male staff. The barriers that women notice can operate in subtle ways. Height and weight restrictions, for example, can screen out women as candidates for certain jobs. Training programs that are limited to higher paid employees will also exclude women, because traditionally they are employed in lower paying jobs. Recruiting and promotion policies can favour men as well when decision-makers assume that women with family responsibilities, for example, are unwilling to travel, relocate or commit themselves to demanding workloads. Such stereotyping is an obstacle that continues to hinder women's progress.

If women employees in an organization see that there are few females in positions of authority or few at work in non-traditional fields, this fact will also act as a barrier. Women will interpret the low representation of their gender as evidence that the organization is favouring men. The organization may state that it does not discriminate against women — yet the composition of its workforce contradicts that statement. The organization's female employees respond to the reality they observe. This will discourage women from seeking advancement or improving their status. Female role models must be visible before women become convinced that employers are acting on their beliefs, and hiring and promoting women — as well as men.

Barriers like these must be removed if women are to enjoy full equality at work. Organizations committed to equal opportunity are making a concerted effort to search out such barriers and eliminate them. By introducing an employment equity program, an employer can systematically investigate the workplace for evidence of discrimination — and then develop remedies to reverse its effects.

'At Manufacturers Life Insurance, employment equity has become part of the corporate culture. Employment equity practices have resulted in lower turnover rates, an ability to attract and retain quality employees, and higher morale.'

E. Sid Jackson
President
The Manufacturers Life Insurance Company

Benefits of Employment Equity

Why should an organization spend time and energy on an employment equity program? The answer is found in the many important benefits the program offers to employers.

Employment equity produces a human resources management system that is fairer and more efficient. Employment equity broadens the pool of candidates for jobs; it strengthens internal recruitment and hiring methods by eliminating biases; and it takes full advantage of all of its human resources — not just a portion of them.

Employers who have introduced employment equity report a number of additional benefits.

Employment equity can produce a more stable labour force; a more productive labour force; and a more committed labour force. Staff turnover often drops significantly. The special measures included in an employment equity program — such as work-sharing, flexible working hours and special parental benefits — have a positive impact on both the morale and the productivity of employees.

All of these benefits combine to improve both the internal and external corporate image of an organization. They also sharpen the organization's competitive edge.

In short, employment equity makes good business sense.

'If you really want people to get involved in your business, you have to open it up to the best people. And if you're not considering women, then you may not be getting the best.'

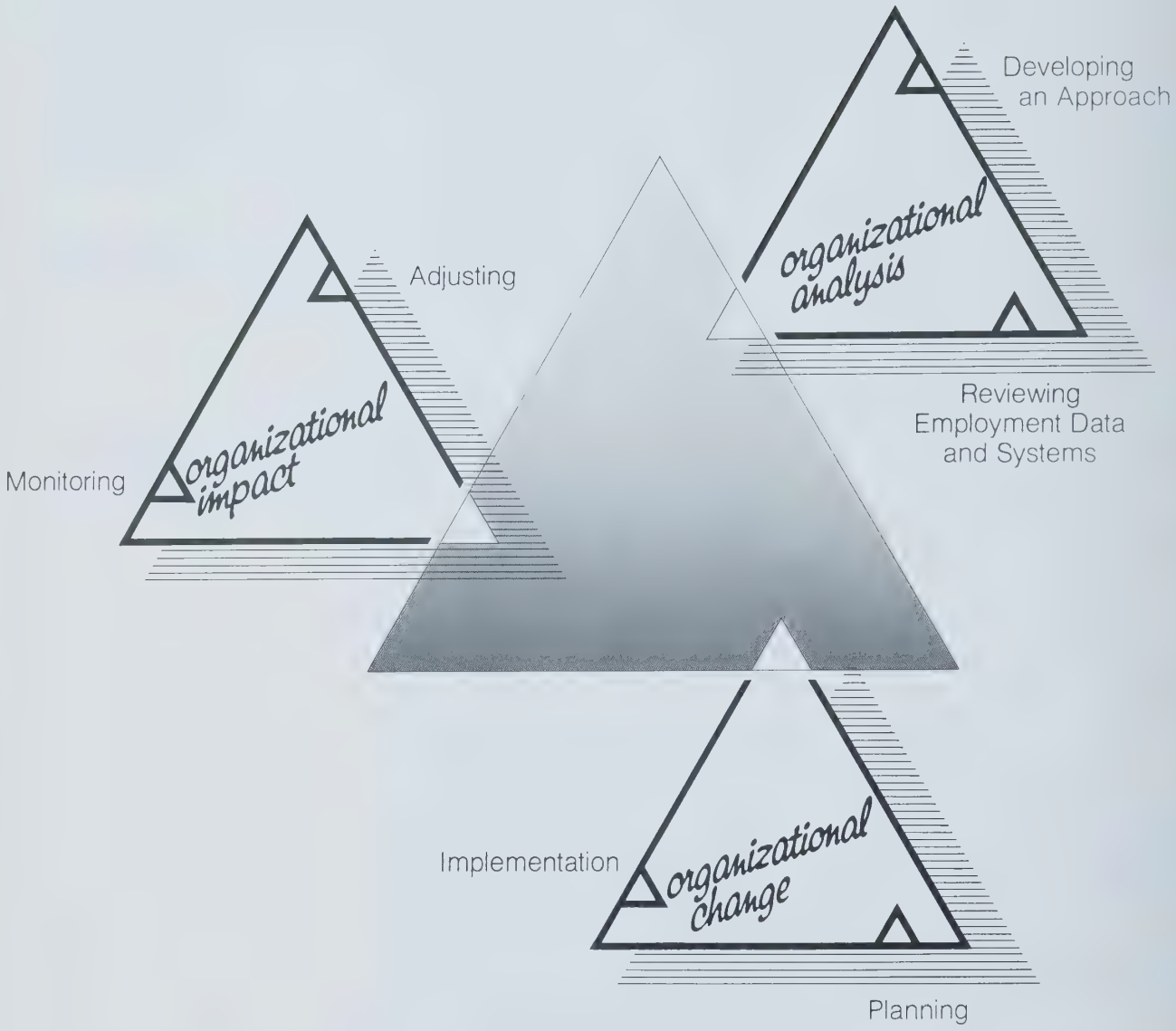
R.W. (Bob) Martin
President and Chief Executive Officer
The Consumers' Gas Company Ltd.

Employment Equity Checklist

How does your organization measure up in terms of employment equity?
The following checklist might give you an indication.

- Do you have a corporate policy statement on employment equity?
- Have you recently reviewed your policies and practices to determine whether or not they are relevant to your existing employees?
- What is the distribution of men and women across occupational groups in your organization?
- Do your hiring and promotion policies recognize the growing ambitions and participation of women in the workforce?
- Do you have a job evaluation process that ensures equitable compensation for all your staff?
- Have you conducted a survey of employee attitudes towards employment equity?
- Are your managers and supervisors aware of their responsibilities under existing legislation? Are they following policies that provide equitable treatment to current or potential employees?
- Are all employees eligible for training programs?
- Is your organization affected by current employment equity legislation? Contract compliance regulations?
- Have you considered alternative working arrangements such as variable working hours, job-sharing, or part-time work?

Employment Equity Management Process



The Management Process

The emergence of women into the paid labour force is one of the most significant changes of this century. Women are flooding into the job market helping to reshape the economy and boost economic growth. Attracted to the labour force in great numbers at a time of expansion, today's women will remain in the labour force throughout their lives. They will provide the linchpin in the shift to a service and information economy.

To remain competitive, organizations are continually adapting to change — changes in products, changes in markets, changes in services or the mix of services. Technological changes have altered the nature of the work and the skills needed to perform new jobs. Human resources planning systems help in the effective management of all these changes. They provide employers with adaptive tools and strategies to anticipate, forecast and meet future demands for human resources which correspond to the long-term strategies and plans of the organization. The relationship between the human resource management process and employment equity is simple and straightforward. Employment equity will ensure that your organization's human resource management system runs fairly and efficiently. Employment equity programs will vary from company to company depending on such things as its size, location, industrial sector, arrangement style, economic health and workforce composition. Like any human resource management activity, employment equity programs must fit the needs and culture of the organization. Each organization can develop a distinct approach to meet its particular objectives. Nevertheless, the employment equity management process has certain important elements that are discussed in this series. This series will provide a guide for each organization to establish its own priorities for action.

The Series

Other booklets in the **Managing Employment Equity** series include:

An Overview

This booklet outlines the benefits that an employer can expect from an employment equity program and, in general terms, describes the process involved in establishing it within an organization. The booklet also identifies the factors that lead to success in employment equity programs. A section on the resources available to employers is included, along with a bibliography listing relevant publications on the topic of employment equity.

Organizational Analysis

Organizational analysis is the first step in the employment equity management process. This booklet takes the reader through the various steps that are necessary to conduct an employment equity analysis of an organization. It will help an organization identify employment equity issues and then develop solutions which fit its organizational environment. This part of the series provides an organization with a framework that will shape its preliminary approach to employment equity. Guidelines on reviewing both the status of women in an organization and current personnel policies and practices are included.

Organizational Change and Impact

This booklet covers the second and third major steps in an employment equity program — organizational change and impact. The section on organizational change outlines the strategies an organization can use to develop and implement an employment equity plan. It identifies the key elements of the plan — developing goals, targets, non-biased systems and special measures, and assigning responsibility and resources. The booklet also discusses how to develop an implementation strategy so that changes will occur effectively. It provides guidelines on creating a favourable climate for employment equity.

The section on organizational impact shows employers how to assess the impact of an employment equity plan and program. Measuring the impact of the program is essential to its success. Monitoring and evaluation methods are provided, along with guidelines on how to make any necessary modifications to the program.

Legislation — A Guide for Employers

The fifth booklet in this series highlights the provincial and federal legislation concerning employment and employment equity. This booklet includes information on employer requirements in hiring and selecting workers according to the Ontario Human Rights Code; standards for conditions of employment relating to the Employment Standards Act; and the legalities involved in developing special programs for designated groups of employees. As well, the federal employment equity act and the federal contract compliance program are briefly explained.

Employment Equity Initiatives

A number of private and public sector organizations are involved in employment equity initiatives. The last booklet in this series highlights a selection of their experiences, showing how each organization is putting employment equity into action in practical ways.

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Resources

Ontario Women's Directorate
Consultative Services Branch

The Ontario Women's Directorate is the agency in the Ontario government that co-ordinates the development and communication of programs and policies for women. Its aim is economic and social equality for women in Ontario.

The Consultative Services Branch of the directorate specializes in the area of employment equity. It is responsible for encouraging the planning, development and expansion of employment equity programs in Ontario's public and private sectors.

In order to achieve this goal, the branch provides a wide range of consulting services to employers who are either just beginning to initiate employment equity programs, or who wish to enlarge those that are already established. Consultants offer employment equity strategies that are tailored to the organization's particular environment.

The services that this branch offers include:

- Workshops and seminars
- Technical guides and information
- Videos
- Advice on relevant legislation and government policies
- Opportunities to exchange ideas with other employers through networks and demonstration projects
- Recognition of success through annual awards in employer excellence

For further information, contact:

The Consultative Services Branch
Ontario Women's Directorate
4th Floor, Mowat Block
900 Bay Street
Toronto, Ontario M7A 1C2
(416) 965-7785

Additional information about special designated groups is available from:

Handicapped Employment Program
Ontario Ministry of Labour
10th Floor
400 University Avenue
Toronto, Ontario M7A 1T7
(416) 965-2321

Race Relations Division
Ontario Human Rights Commission
11th Floor
400 University Ave.
Toronto, Ontario M7A 1T7
(416) 965-1613

Publications in this Series

Managing Employment Equity

- Introduction to a Series
- An Overview
- Organizational Analysis
- Organizational Change and Impact
- Legislation — A Guide for Employers
- Employment Equity Initiatives

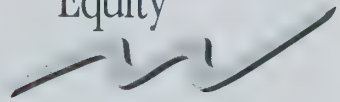
Ontario Women's Directorate

Honourable Ian Scott
Attorney General and
Minister Responsible
for Women's Issues

ISBN 0-7729-2467-8

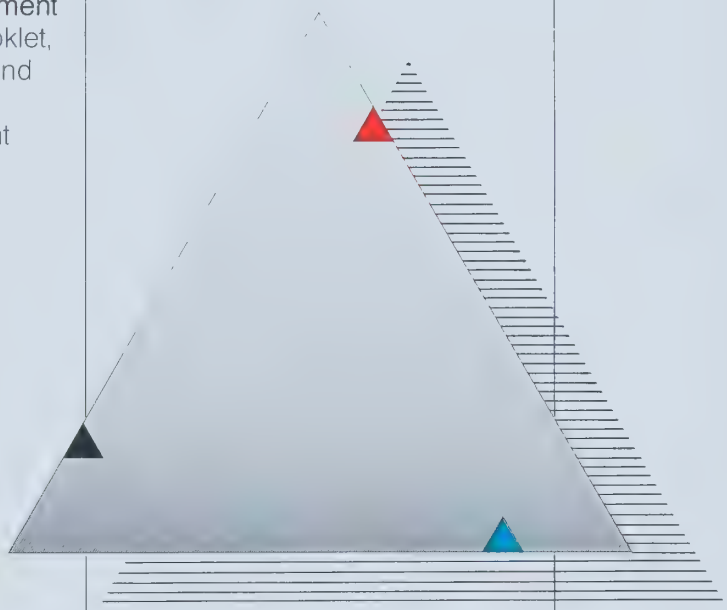
an overview

Managing Employment Equity



Ontario Women's Directorate

This booklet is the second of a six-part series of publications on employment equity produced by the Ontario Women's Directorate. The first booklet introduces the series. In this one, we offer an overview of the employment equity management process. The third booklet, entitled **Organizational Analysis**, begins a more detailed look at the process. **Organizational Change and Impact** completes the examination of the process. The fifth booklet is entitled **Legislation — A Guide for Employers**. **Employment Equity Initiatives**, the sixth booklet, features practical examples and ideas from organizations with experience in the employment equity field.



Organizational Analysis

The first step in the employment equity management process is organizational analysis — a review of the workplace and the people in it.

Organizational analysis is the foundation stone of the process, for it allows employers to gather all of the pertinent information they will need for the changes that lie ahead.

Organizational Change

The employment equity program — just like any program that results in significant change within an organization — must be handled with care and sensitivity.

It therefore requires careful planning and implementation if it is to be effective, if it is to be successful, and if it is to have a positive impact.

Organizational Impact

All good managers want to be able to assess the impact of change on their organizations.

They must consequently monitor the employment equity process as it moves through each step towards its ultimate goal — a workplace in which people are hired, trained, promoted and paid on the basis of merit alone.

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Introduction

The primary purpose of an employment equity program is to ensure that an organization hires and promotes staff on the basis of competence only. This principle acknowledges the changing workforce and provides a work setting of equal opportunity.

Undeniably, the workforce has undergone a profound transformation in recent years, with a rapid influx of women representing a sizeable pool of talent, education and skills. The shrewd employer will take advantage of this resource and tap its enormous potential. By providing equal opportunity for all employees, organizations not only respond to modern trends — they benefit from them.

Today, more and more managers must deal with new government regulations, new products, growth, increased competition, technological developments — and a changing workforce. In response, most employers have to reorganize periodically. A stagnant organization is at risk in the modern business environment. Progressive, dynamic strategies for change are essential if organizations are to keep pace. Management issues must be recognized and acted upon.

Employment equity should be tackled like any other management issue — with a comprehensive set of practical action steps. Developing a strategy to put the program into place will allow employers to actively manage the process of change, instead of reacting to it passively.

This series of booklets provides step-by-step guidance to employers by helping them develop an employment equity plan; showing them how to introduce the program; and by helping them ensure that it is established and maintained successfully. The series acts as a framework for those organizations that are committed to employment equity and ready to explore it.

No single employment equity approach is right for each and every organization. Certain elements, however, are fundamental to the program. They include: elimination of discrimination in hiring and promotion policies; the development of priorities and the establishment of objectives; and the improvement of access to job opportunities. But they can all be adapted to fit the organization and its particular needs.

The objectives of an employment equity management process are:

- To eliminate bias from employment practices and policies;
- To reduce the wage gap between men and women;
- To achieve a balanced representation of males and females in all occupations and at all organizational levels.

By understanding the corporate climate in your organization, you lay the groundwork for the management of an employment equity program. Employment equity programs vary considerably, depending on an organization's location, industrial sector and available resources.

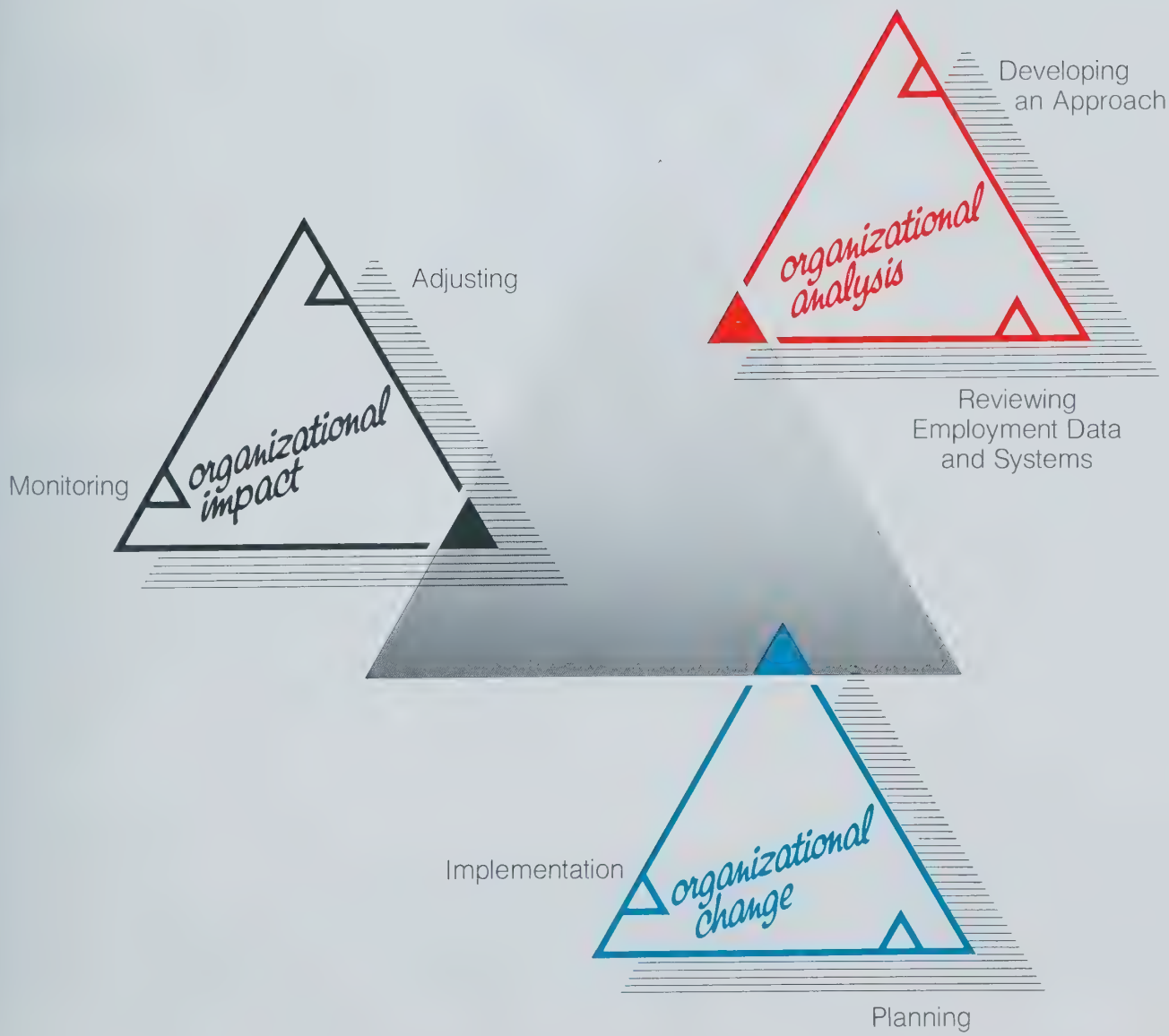
In addition, some organizations may be affected by specific requirements. One of the booklets in this series, Legislation — A Guide for Employers, describes the legislative requirements on this issue and the organizations covered under the law.

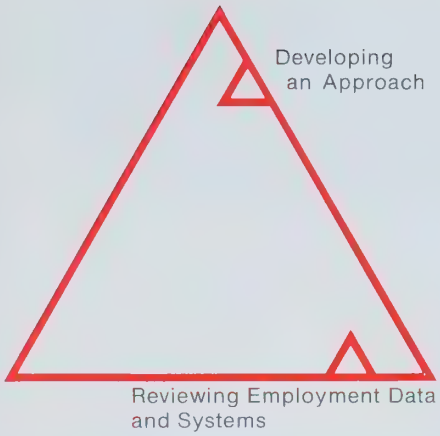
With the introduction of an employment equity program, organizations should observe an improvement in the distribution of women; a reduction in the wage gap between men and women; an increase in women's involvement in decision-making; and a growing overall contribution from the women in the workplace.

The benefits employment equity brings to the entire organization are significant. Along with lower turnover, increased productivity and higher motivation, employers with experience in employment equity notice that the organization's general management improves as well. They report a wider choice of candidates for jobs; a detailed personnel data base; more clearly defined personnel policies and practices; improved information flow

to management and employees; more accurate information on the attitudes and opinions of employees; and, finally, the development of management skills that allow the organization to handle the process of change more effectively.

In this booklet we introduce employers, in general terms, to the steps involved in establishing an employment equity program. Other booklets in the series offer detailed information on each step.





organizational analysis

An essential first step in employment equity is a preliminary assessment of the organization's status. This assessment investigates the attitudes, policies and practices within the organization, and identifies the areas on which the program will focus. Essentially, this step provides a diagnosis.

Analyzing your organization allows you to collect the information you need in order to design and implement an effective employment equity policy and a program that will will fit your particular environment. The analysis will help you to recognize barriers to women's advancement and to develop measures to enhance the participation of women throughout the organization. Organizations differ markedly in terms of corporate climate and employment systems — thus, the adopted approach will also vary from organization to organization.

Developing an Approach

The corporate environment includes the written and unwritten rules, traditions, practices, attitudes and structures of an organization. A knowledge of your environment and how women operate within it will help you to develop preliminary strategies for change.

Your organization is affected by other important factors, such as:

- Size
- Composition of the workforce
- Industrial sector
- Geography
- Number of locations
- Economic climate

The analysis of the corporate environment will indicate how to communicate senior level commitment; how to allocate staff and financial resources; and how to develop a communications strategy that will involve employees in the employment equity process.

As with any other corporate objective, *visible* senior management support for employment equity — particularly at the level of Chief Executive Officer (CEO) — is an essential element of program success. It also ensures the allocation of appropriate human and financial resources.

Assigning staff responsibility to guide your organization through the change process is a crucial consideration at this point. You need staff who understand your corporate environment, who understand employment equity and who can play an effective role in bringing about organizational change.

'Employment equity is not a linear program. You need to be flexible and creative. You have to look at the organization as a whole — the corporate climate, the way it deals with change, and with decision-making — so you can develop a program which works.'

Geri Markvoort
Human Resources Consultant
Abitibi-Price Inc.

Reviewing Employment Data and Employment Systems

Employment systems determine how your workforce is recruited, managed, trained and rewarded. They are one of the principal means by which corporate goals can be realized. They are also the means by which employment equity goals can be achieved. Employment systems include hiring, promotion, salaries and benefits, job classification, training and termination policies and practices.

A statistical analysis of the workforce (the equity audit) is an essential management tool for an employment equity program. It provides the framework for setting goals and targets to improve women's participation. It also provides baseline information for monitoring and evaluating changes in where women work in the organization, their qualifications, length of service and career progression. Existing pay and benefits records and personnel data will be useful in compiling the statistical information you need.

Experienced organizations report that statistical analysis is a valuable exercise. It can improve an organization's information about the characteristics and distribution, not only of the female workforce, but of all employees. The analysis can also help to narrow your focus when you begin to review your personnel policies and practices.

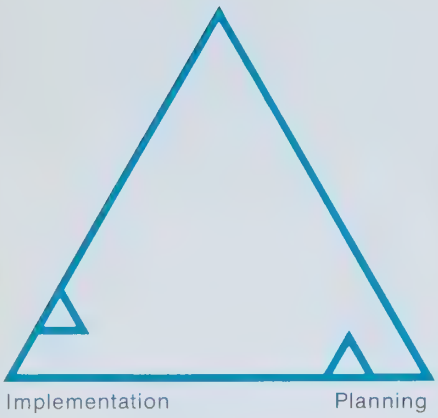
An analysis of your employment systems (the personnel policies audit) is needed to identify those policies and practices that may contain hidden barriers to employment opportunities for women. These practical questions will help you to assess your policies.

- Is the policy job-related? Is it based on *bona fide* occupational requirements?
- Is it valid? Does the required qualification have a direct relation to job performance?
- Is it applied consistently?
- Is it a business necessity? Is the practice necessary for the safe and efficient operation of the organization?
- Is it legal? Does it comply with human rights and employment standards legislation?
- Does it have an adverse impact? Does it affect women more than other employees?

This analysis will give you insight into how your policies can be improved. It will also provide you with a framework for making those improvements.

'A more objective human resources management system works for women, but it's also beneficial for everyone — because people know the system is fair.'

Mary Bruce
Director, Equal Opportunity
City of Toronto



organizational change

Organizational analysis lays the groundwork for organizational change. You have developed a preliminary approach; you have collected your workforce statistics; and you have reviewed your employment systems. You are now ready to develop a plan and put your implementation strategy into action.

The planning process will vary from organization to organization. But in all cases, implementation of the plan requires careful consideration to ensure that the changes are accomplished effectively and that they become part of your organization's corporate goals and systems.

Plan Development and Implementation Strategy

The purpose of your employment equity plan is to develop strategies for change. Plan development involves:

- Establishing priorities
- Developing goals, timetables and resources
- Developing non-biased systems
- Developing special measures
- Assigning responsibility and accountability
- Identifying monitoring systems.

Goals and timetables are the core of your employment equity program. They will ensure that tangible changes and improvements are actually made — not just talked about. Your goals should be flexible and tied to reasonable timeframes. Goals will also vary according to the structure of your organization.

Organizations have shown a wide variety of approaches in setting goals. In the broader public sector employment equity planning has tended to be a centralized function. Other organizations have adopted a decentralized approach. In some companies, for example, every division accepts its own employment equity plan, which is co-ordinated and evaluated corporately.

An implementation strategy ensures that changes will occur smoothly and effectively. It should create a favourable climate for change. The implementation strategy includes:

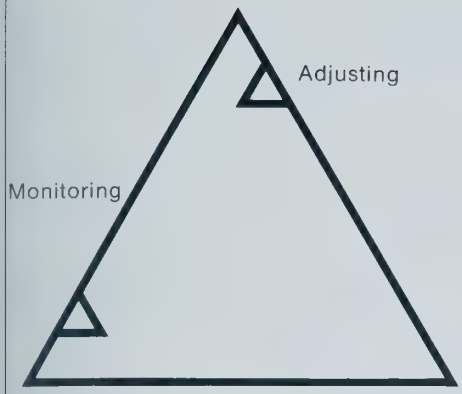
- Definition of roles
- Development of program guidelines
- Training and development for managers
- Communication strategy
- Integration of the plan into other management systems

Implementation of the plan should be considered during the program's development. If you have few women in the workforce, or if women occupy traditionally female jobs, you may want to focus, for example, on communications and on training and development activities. You could then begin to revise your personnel policies and practices, and to adopt measures to increase women's participation throughout your organization. If the organization is expanding, an active recruitment policy would be the next step.

The aim of the implementation strategy is to integrate employment equity management into the human resources management system.

'If you make management responsible for employment equity, just as if they were handling occupational health and safety, merit increases, pay levels or any other workplace issue, then they'll handle it.'

Robert Martin
President, Consumers Gas Co. Ltd.



organizational impact

Organizational changes have been set in motion as you implement the employment equity plan. You will now want to assess the impact of these changes on your organization. You need an ongoing system to monitor the program; to assess the achievement of goals; to adjust the program where necessary; and to communicate results.

Monitoring and Adjustment

Reporting mechanisms capture both statistical data and changes in employees' attitudes towards the program — two components that are critical to its progress. Records of training activities, promotions, hirings and terminations will measure changes statistically. Attitude surveys, interviews and the performance appraisal system can be used to assess qualitative changes in the corporate environment.

Employment equity staff and line managers can work together to assess the effectiveness of the program and, if necessary, devise new strategies to improve results. Annual reports help your organization document and evaluate progress and adjust different program areas as needed. From time to time, it is useful to formalize the adjustments and issue an updated plan with new program goals and timetables.

Organizations that have employment equity programs emphasize that, especially at the beginning, a visible monitoring system provides incentives for both employees and management. In addition, changes that are based on suggestions from line managers and employees tend to increase ownership and commitment to the program.

'You have to maintain and support the new initiatives. Ongoing monitoring will really make a difference in your program. It's not just that you need the numbers to evaluate the changes. A high profile monitoring system is a useful strategy for communicating your commitment.'

Paul Scott
Director, Employment Equity
Municipality of Toronto

Key Success Factors

Employment equity programs work. Organizations with programs in place point to a number of factors that led to their success.

- Framing employment equity within the corporate purpose and within the context of human resources.
- Recognizing how the internal and external organizational climate reacts to change.
- Establishing strong, visible senior level support.
- Appointing appropriate management and staff to guide and oversee the program.
- Collecting baseline information on the characteristics and distribution of the workforce.
- Establishing objective criteria for assessing personnel policies.
- Establishing flexible and available goals.
- Setting priorities based on attainable resources.
- Transferring responsibility for employment equity to line managers.
- Monitoring and adjusting the program on an ongoing basis.
- Integrating employment equity within existing management systems.

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Resources

Ontario Women's Directorate
Consultative Services Branch

The Ontario Women's Directorate is the agency in the Ontario government that co-ordinates the development and communication of programs and policies for women. Its aim is economic and social equality for women in Ontario.

The Consultative Services Branch of the directorate specializes in the area of employment equity. It is responsible for encouraging the planning, development and expansion of employment equity programs in Ontario's public and private sectors.

In order to achieve this goal, the branch provides a wide range of consulting services to employers who are either just beginning to initiate employment equity programs, or who wish to enlarge those that are already established. Consultants offer employment equity strategies that are tailored to the organization's particular environment.

The services that this branch offers include:

- Workshops and seminars
- Technical guides and information
- Opportunities to exchange ideas with other employers through networks and demonstration projects
- Videos
- Advice on relevant legislation and government policies
- Recognition of success through annual awards in employer excellence

For further information, contact:

The Consultative Services Branch
Ontario Women's Directorate
4th Floor, Mowat Block
900 Bay Street
Toronto, Ontario M7A 1C2
(416) 965-7785

Technical Aids

- Sample policy statements
- Sample job descriptions for employment equity co-ordinators
- Employment equity practitioner's workshop and manual
- Sample outlines of training and workshops for managers
- Videos and films
- Sample employee surveys

Publications in this Series

Managing Employment Equity

- Introduction to a Series
- An Overview
- Organizational Analysis
- Organizational Change and Impact
- Legislation — A Guide for Employers
- Employment Equity Initiatives

Ontario
Women's
Directorate

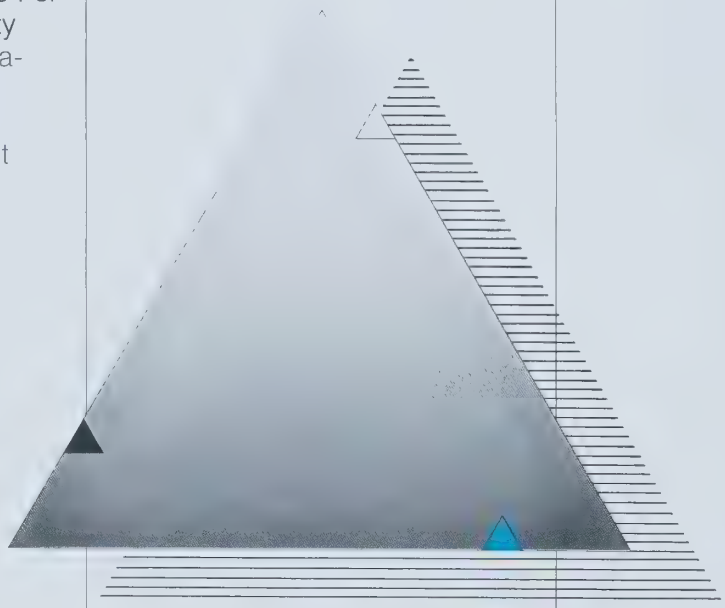
ISBN 0-7729-2468-6

organizational change and organizational impact

Managing Employment Equity

Ontario Women's Directorate

Organizational Change and Impact is the fourth of a six-part series of publications on employment equity produced by the Ontario Women's Directorate. The first booklet introduces the series. The second booklet gives an overview of the employment equity management process. The third booklet, entitled Organizational Analysis, begins a more detailed look at the process. In this booklet, we complete an examination of the process. The fifth booklet is entitled Legislation — A Guide For Employers. Employment Equity Initiatives, the sixth booklet, features practical examples and ideas from organizations with experience in the employment equity field.



Organizational Analysis

The first step in the employment equity management process is organizational analysis — a review of the workplace and the people in it.

Organizational analysis is the foundation stone of the process, for it allows employers to gather all of the pertinent information they will need for the changes that lie ahead.

Organizational Change

The employment equity program — just like any program that results in significant change within an organization — must be handled with care and sensitivity.

It therefore requires careful planning and implementation if it is to be effective, if it is to be successful, and if it is to have a positive impact.

Organizational Impact

All good managers want to be able to assess the impact of change on their organizations.

They must consequently monitor the employment equity process as it moves through each step towards its ultimate goal — a workplace in which people are hired, trained, promoted and paid on the basis of merit alone.

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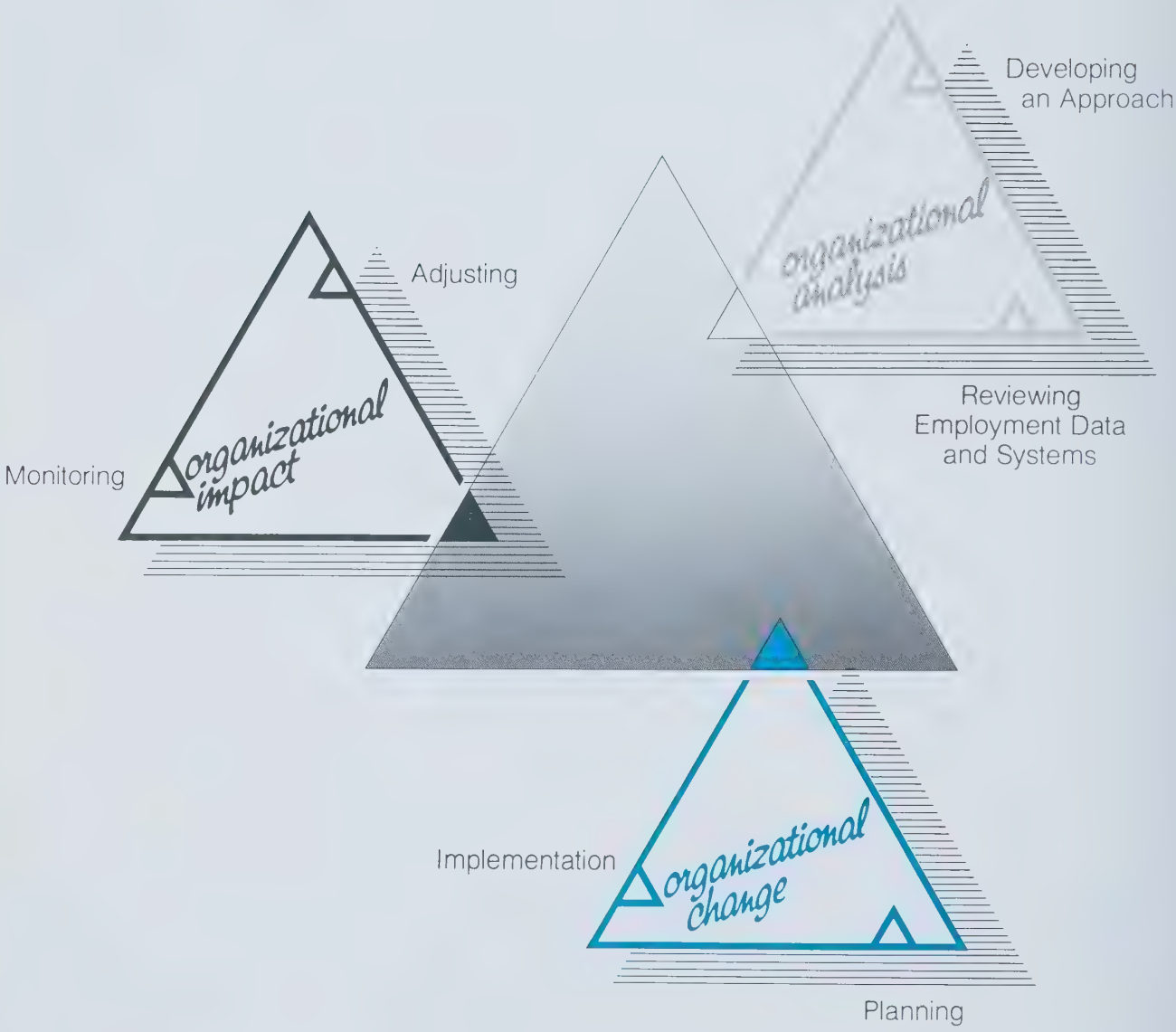
Employment Equity Management Process

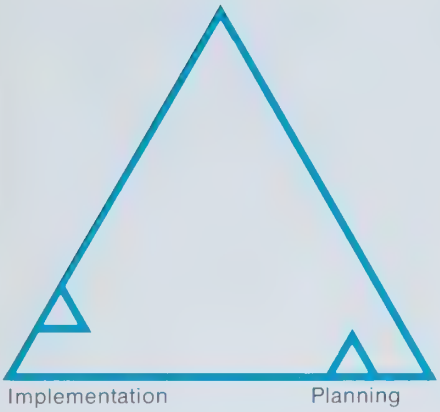


Introduction

This booklet takes an organization through the second and third major steps in the employment equity management process — organizational change and organizational impact.

This phase of the program presents an organization with its biggest challenge. At this point, the organization has analyzed its present situation, is ready to shape the employment equity program and put it into action. Yet it must also recognize the importance of introducing the program with care, to ensure its eventual success. Organizational change must acknowledge the environment of the workplace and show sensitivity to its particular concerns. In this respect, an employment equity program is no different from any other important management issue. It must be tackled systematically — with a set of practical action steps. A plan will provide the tools to manage the process. The planning process will vary from organization to organization, but in all cases the goal is to integrate employment equity principles so that they become part of the corporate culture.

This booklet describes the steps that organizations can take to offer equal opportunity to their employees. It also outlines the methods that employers can use to ease their organizations into the transition. Each of these stages brings employers closer to an environment where employment equity is a working reality.



organizational change

In the analysis phase of the employment equity planning process, the organization makes a commitment to review its management of people and to ensure that it is dealing with them fairly and objectively. To follow through on its commitment, planning and implementation strategies are necessary. These will allow the organization to manage the change process in a way that ensures positive effects.

Plan Development and Implementation Strategy

The purpose of the planning process is to develop solutions to the problems identified by the organizational analysis. The plan:

- Establishes the organization's priorities
- Sets reasonable goals and objectives
- Develops non-biased systems and special employment measures
- Identifies and assigns responsibility and resources to meet the objectives
- Identifies monitoring systems to evaluate the change process and to make adjustments to the program

The development of an implementation strategy ensures that planned changes occur smoothly and effectively. It creates a favourable climate for change. A good implementation strategy clarifies the responsibility and accountability roles for the overall employment equity program — including the role of senior management, the employment equity co-ordinator and line managers. In addition, a communications strategy complements the implementation process. Finally, the implementation strategy integrates the employment equity program into the organization's corporate goals and systems.

Specifically, it requires:

- The definition of roles
- The development of anti-discrimination guidelines
- The establishment of training and development opportunities for managers
- The creation of a communications strategy
- Integration of the plan

Employment Equity Plan Development

An employment equity plan sets the scene for action. It should:

- Identify and eliminate current discrimination
- Redress past discrimination
- Ensure a balanced representation of designated groups throughout the entire organization
- Reduce the wage gap between men and women

The plan should reflect the objectives, structures, management style, resources and value systems of the organization. Economic and political environments, as well as labour market participation rates and growth projections of an organization, also play a part in shaping the employment equity plan.

Problem-solving is the key role of the plan. The problems it will identify, and the solutions it will develop, will be unique to each organization and will reflect the organization's individual environment. The solutions that are formulated will be based on the capacity of the organization to carry out the plan and to work towards equity goals.

As a result, individual plans will differ. There are certain key characteristics, however, that are common to all effective employment equity plans:

- The establishment of priorities
- The development of goals, timetables and resources
- The development of non-biased systems
- The development of special measures
- The assignment of responsibility and accountability
- The identification of monitoring systems

Establishing Priorities

The organizational analysis has already identified employment equity issues and problem areas for a particular organization and has probably made specific recommendations on resolving them. The next step, then, is to establish the program's priorities. This should be the responsibility of senior and line management and the employment equity co-ordinator. Critical decisions about the nature of the equity plan and program are often based on these priorities, so staff involvement is important.

A progress report should follow the decision-making step, to help set the stage for the planning process to come. The report should outline the organization's employment equity approach; identify its priorities; indicate the people responsible for the plan; and tell employees how they can provide input.

'As the human resources consultant, I co-ordinated the environmental analysis and got the numbers together. It was important to go back to the policy committee at that point to make a formal presentation on the findings and to get their approval to go ahead.'

Geri Markvoort
Human Resources Consultant
Abitibi-Price Inc.

Developing Goals

Naming goals and timetables is essential to an employment equity plan. Goals are required in order to ensure that change does in fact take place.

Short-, medium- and long-range goals are advisable. They make it far easier to assess the impact that different activities are having at specific times, and to pinpoint changes that may be necessary. Goals that are phased will also make it easier to assign accountability for the program to appropriate employees. A corporate long-term goal, for example, could be to increase the number of women in senior level positions by 25 per cent. Interim goals will chart the progress of each division in reaching that ultimate target. Short-term goals might ensure that managers understand the corporate commitment to employment equity and that they develop their own plans of action to meet their division objectives.

Organizations have found that the following points are crucial in preparing a set of employment equity goals:

- Goals should match the issues identified in the organizational analysis
- Goals should be specific and concrete in order to be measurable
- Goals should be realistic and be tied to reasonable time frames
- Goals should be accompanied by clearly identified resources and responsibility structures
- Goals should be integrated into corporate planning systems

An employer could set a goal, for example, of establishing an outreach program to recruit qualified women. Another goal might be to increase the number of women employed in non-traditional positions.

Goals are not quotas. They are estimates of the results that an organization can expect, knowing its workforce; the availability of the external workforce; and the special measures it is contemplating. Goals are the tools an organization can use to assess the impact of changes and to make adjustments where necessary.

Employment Equity Initiatives — the sixth booklet in this series — gives examples of a number of different approaches to goal development that have been used by various public and private sector organizations.

Developing Non-Biased Systems

Every organization develops personnel practices and policies that govern decisions on training, hiring, promotion, succession planning, career paths and other aspects of employment. These decisions can affect the company's employment equity performance.

Within employment policies and practices, there may be either direct or indirect discrimination. Height and weight restrictions, for example, and unnecessary physical tests often tend to screen women and some visible minority groups out of job opportunities for which they may, in fact, be well qualified.

The organizational analysis, including the personnel policy audit, will have pinpointed discriminatory policies and practices. They must now be replaced with neutral policies. A neutral employment policy is one that does not have an adverse impact on women or other designated groups. It is important to remember at this point that an organization has informal policies that may also need attention.

(Informal policies are those that are not written into an organization's policy manual but that have nevertheless become part of the corporate culture.)

Employment Practices

Examples of Systemic Discrimination	Examples of Possible Solutions
1. Recruitment practices that limit applications from designated groups, e.g., word-of-mouth, internal hiring polices.	Word-of-mouth could be supplemented by contacting community organizations representing designated groups or the local Canada Employment Centre.
2. Job descriptions, performance appraisals and job evaluation systems that undervalue the work of positions traditionally held by women.	Rewrite job descriptions, rationalize evaluation systems, offer special training for supervisors to make them aware of how to eliminate gender bias.
3. A workplace environment that does not expressly discourage sexual harassment.	Issue a company policy against sexual harassment with guidelines and follow-up through appraisal and discipline procedures; develop complaint and problem-solving mechanisms for all employees.
4. Written material that always uses male gender references.	Review written material and eliminate gender-biased language in policies, job descriptions, etc. Issue policies and guidelines instructing that all organization communications acknowledge a male and female audience.

Some organizations will only require minor changes to their policies in order to make them neutral. Others will need major revisions, or even brand-new policies and practices, that properly reflect the mixed workforce and avoid discrimination. (See Appendix I, **Organizational Analysis**, the third book in this series.)

Reasonable Accommodation

The concept of "reasonable accommodation" is used by human rights tribunals across Canada to refer to employers' responsibilities in meeting the needs of employees. Reasonable accommodation can involve such measures as: redesigning job duties or work stations for disabled employees; or offering flexible work schedules to employees who participate in traditional hunting and fishing activities at certain times of the year but who wish to work unusually long hours at other times. Often, many employees benefit from these measures, which are designed to assist designated group members without causing "undue hardship to the employer."

Human Rights Codes provide that where a requirement or qualification would result in systemic or constructive discrimination, the requirements or qualifications must be reasonable and *bona fide* in the circumstances. A recent amendment to the Ontario Human Rights Code goes even further. It provides that a Human Rights Commission or a court cannot find a requirement or qualification to be reasonable and *bona fide* unless it is satisfied that the person being discriminated against cannot be accommodated by the employer without "undue hardship." This amendment will likely come into force in 1987.

Developing Special Measures

Included in an employment equity plan should be special measures designed to accelerate the full participation of women (or other designated groups), in the organization's workforce. These measures can remedy the effects of past discrimination, as well as improve the current climate for women employees.

Remedial measures offer *temporary* preferential treatment to the designated target group in order to redress past discrimination. These short-term measures do not result in permanent changes to an organization's systems. They are limited, however, to the designated target group and, unless they are handled effectively, can provoke a backlash from other parts of the organization. Special management training programs for women only, for example, exclude other employees. The Canadian Human Rights Act and the Ontario Human Rights Code sanction such remedial measures, but prior approval from either commission is required. The development of an effective communications strategy is one way of avoiding employee opposition to special initiatives.

Staff commitment to the employment equity program, especially when it develops early and is strengthened by ongoing publicity, will tend to make employees more tolerant of these measures.

Assigning Responsibility and Accountability

Since managers are responsible for implementing an employment equity plan, their involvement in designing the plan is crucial. The employment equity co-ordinator should consult with managers and supervisors to develop employment equity goals that address their needs, concern and priorities. Their involvement in plan development will not only increase managers' "ownership" of the employment equity plan but will help to ensure accountability for its goals.

In a unionized workplace, the involvement of union locals is critical at this stage of the employment equity process. The employment equity plan should include a role for the union. The labour movement generally supports the concept of employment equity — national union organizations have played a leading role in supporting employment equity initiatives. Local representatives should be involved in setting goals and targets and assuming responsibility for those aspects of the employment equity plan that are of particular concern to their members.

Unions can play an important role in providing educational workshops and training sessions. As

well, joint management/union committees can initiate special projects of mutual concern. At General Motors, joint affirmative action committees with the Canadian Auto Workers have been in place in all Ontario and Quebec locations since the firm's 1984 collective agreement. These committees have developed special recruiting and training initiatives. At the Scarborough plant, a "child-care referral" pilot project is underway.

A number of special measures in benefits and compensation packages, and in the working arrangements that have been developed to address employment equity goals, have been negotiated through the bargaining process.

Management and unions have developed employment equity approaches jointly. As well, unions have initiated special measures that have significantly affected women's participation in the workforce. At the Young Women's Christian Association (YWCA) in Toronto, for example, CUPE Local 2189 negotiated a six-month unpaid maternity leave, as well as a child care payment of $30 per child per month to parents with children under the age of 11.

Responsibility for achieving employment equity goals must flow from an organization's accountability system. Managers, supervisors and, in some cases, unions must be the lead actors for this part of the plan.

Identifying Monitoring Systems

In order to assess the impact of the employment equity plan, a monitoring system must be included as part of it. The system can be developed in consultation with managers, supervisors and human resources specialists. It should be sensitive enough to capture results, and flexible enough to be adapted as needs and priorities change. (More detailed information on designing and implementing a monitoring system is covered later in this booklet.)

Plan Checklist and Format

The following checklist provides a breakdown of the key areas that should be included in the employment equity program.

Employment Equity Plan Checklist	
Policy statement specified	☐
Background information documented	☐
Specific problem areas identified	☐
Priorities documented	☐
Goals and timetables established	☐
Role of union or employee clarified	☐
Resources assigned	☐
Responsibility and accountability assigned	☐
Monitoring mechanisms identified	☐

The Format of an Employment Equity Plan

Employment equity initiatives should be incorporated in corporate and department plans using the standard formats. In addition, it is desirable to have a consolidated employment equity plan for reference and to present, or have available, for managers and employees.

One suggested format is as follows:

Action Area	Recommendations	Responsibility	Goal and Date
Promotion	1. The inventory of senior women should be updated and accessed for all manager positions. Women from this list would be invited to apply.	Executive Development	Immediate increase in referral rate by over 50% last year
Recruitment for non-traditional jobs	1. Establish outreach recruitment including selective advertising inventories 2. Review job qualifications	Personnel	In 3 months, inventory established; selective advertising immediately; change in pool of 30%
	3. Managerial goals	Managers	Immediate; dependent on area; expressed as number of people to be hired

This plan document should also provide:

- a definition of employment equity
- the employment equity mission of the organization
- the purpose of the employment equity plan
- the basis of problem identification
- the establishment of goals and timetables
- responsibilities and accountabilities
- program evaluation criteria and feedback

Summary

An organization's Employment Equity Plan should:

- reflect the needs and priorities of the organization
- address —
  - i) the elimination of discrimination
  - ii) adjustment necessary to compensate for the effects of past discrimination
  - iii) appropriate representation of women across all levels and occupations
- articulate solutions for the problems that have been identified
- include a clear description of organization policy and commitment (mission/mandate)
- be based on qualitative and quantitative information describing the utilization of women in the organization or include plans for obtaining the information
- include specific goals and timetables
- include roles, responsibilities and accountabilities
- identify senior level responsibility
- include measures for changing the political and cultural, as well as the technical, environment
- pinpoint managerial and supervisory accountability
- outline the development of systems to monitor and evaluate progress in a timely basis

Developing an Implementation Strategy

Different groups within an organization will play a role in implementing the employment equity plan. They include: senior management; line or divisional managers; human resources specialists; and all supervisory staff.

Many people within the organization may not completely understand employment equity. It may challenge their traditional attitudes and beliefs about the roles of women and men, which may affect both personal and professional relationships. It may make them apprehensive about how the program will affect their own careers.

The implementation strategy will help staff work effectively in the same direction. It will consider the probable impact of the program and respond to it. At the same time, it will offer support and incentives to employees to encourage them to carry out the changes that will be necessary if the program is to be effective.

In general terms, the purpose of an implementation strategy is: to clarify the roles, responsibilities and rewards attached to the employment equity program; to promote mutual responsibility for the program and its goals; and to further an understanding of the process as part of the organization's corporate ethic. An implementation strategy achieves its goal by:

- Clearly defining the roles of senior management, the employment equity co-ordinator (i.e. the staff person responsible for day-to-day activities) and line managers
- Offering anti-discrimination guidelines for managers and supervisors
- Including training and development activities for managers
- Including a communications strategy as a support measure

The implementation strategy should also consider how employment equity will be finally integrated into the human resources planning and management systems of the organization.

Defining Roles

Senior Management

Senior level commitment to employment equity is *essential* to the program's success. This commitment is made explicit in the organization's policy statement and in supporting documentation. Throughout the entire implementation process, however, management must continue to be responsible and accountable for the employment equity position of the organization, and must make its role clear to the organization's employees. Senior management should, for example, play a role in the employment equity committee, employment equity orientation or training sessions for managers and staff, and make themselves available for regular briefings and updates on the progress of the employment equity program. In fact, senior management should take the opportunity to incorporate the employment equity message into other relevant corporate issues.

Employment Equity Co-ordinator

The staff person(s) assigned to employment equity guides the program on a day-to-day basis. The employment equity co-ordinator assists management, supervisors and staff in developing the various components of the plan.

It is the co-ordinator's responsibility to support the managers in meeting their program objectives. This staff role, while often performed by the human resources or personnel department, is most effective when it can have direct access to the chief executive officer (CEO) in the organization.

At the implementation stage, employment equity staff will be responsible for: training and development activities for managers; program guidelines; ongoing

monitoring and evaluation of program impact; managing the communications program; liaising with outside employment equity practitioners; and informing management of new government equity initiatives.

Employment equity staff often become involved in additional responsibilities — such as career counselling, training sessions for managers or women employees, human rights complaints procedures, and researching and developing special benefits packages and working arrangements. The specific tasks of the employment equity staff will vary depending on the program adopted by the organization.

Line Managers and Supervisors

Although direction for employment equity comes from senior management, responsibility for program implementation rests with line management. Managers and supervisors hire, promote, evaluate and train employees — so their role in employment equity is pivotal. It is essential, therefore, that the employment equity program acknowledges their role and makes them accountable.

The City of Ottawa has developed an effective method to ensure management responsibility. As part of its performance appraisal system, all managers have to measure the progress of employment equity activities in their particular areas of operation. Organizations such as Ontario Hydro have adopted a similar approach. The inclusion of employment equity initiatives within an organization's standard performance measurement system directly integrates employment equity into the corporate planning and accountability cycle. The following checklist outlines the responsibilities of line managers in implementing the employment equity program. They should:

- Set their department goals and targets and measure their progress
- Ensure their department practices reflect corporate policies and initiatives
- Eliminate discriminatory practices and ensure compliance by their department's employees
- Provide career development opportunities to their staff

Anti-Discrimination Guidelines

Good management offers a workplace that is free from discrimination. Many human rights complaints stem from employee's belief that they have been treated unfairly or that the work environment has a different set of rules for different staff members. The employment equity co-ordinator can develop practical guidelines to assist managers and supervisors in creating a positive work environment for all employees. The guidelines should include the basic principles of equal treatment. They include:

Consistency

Managers and supervisors should ensure that employees at all levels are treated in the same way. Conditions of employment, evaluations, pay practices and annual increases are all areas in which consistency must be maintained.

Job Relatedness

The reasons for hiring, promoting, compensating, and so on, must all be related to job requirements. Decisions should be based on facts — not assumptions.

Employment Legislation

Managers should be up-to-date on the law and its impact. Systemic discrimination should be explained and understood.

Complaints Procedures

Managers should be familiar with internal complaints procedures. Complaints should not be ignored.

Complaints should be thoroughly investigated, documented and resolved.

Adverse Impact
Managers should be alert to practices that may have a possible adverse impact — i.e. practices that have a negative effect on one group more than another — and then take steps to modify those practices.

The guidelines suggested here can stand on their own or be integrated into related human resource or employment equity training sessions.

Training and Development for Managers

Because of their pivotal role in program implementation, managers will need a working knowledge of employment equity issues and initiatives. Training and development activities will ensure that managers are well prepared to implement the program successfully.

Employment equity training can be incorporated into existing training packages, or a separate employment equity package can be designed or purchased. At George Brown College, managers participated in a series of seminars on employment equity. Delivered by a consultant, these seminars focused on the implementation of an affirmative action program. Dupont Canada has developed a "Manager's Workshop" that helps participants better deal with their growing accountability for making progress on equity issues.

Training for managers generally concentrates on three areas:

- Background to employment equity — explaining the history of affirmative action, the changing role of women, the continuing problem of employment segregation and the wage gap, and the legal underpinnings for the program
- Employment equity management practices — analyzing the equity status of the organization, developing special measures to improve the status of women, managing organizational change and measuring impact
- Human rights and employment legislation — understanding the legislation and its implications, developing an awareness of internal and external complaints procedures and recognizing sexual harassment.

A trained group of managers will be in a better position to translate policies into practices for the benefit of employees; to develop and achieve the short and long-range employment equity goals of the organization; and, finally, to share in the rewards and ownership of the program.

Communications Strategy

The preparation of a communications strategy is an ongoing activity that starts in the earliest stages of the employment equity program. At the implementation stage, the communications strategy should ensure that all employees are familiar with the employment equity plan and that they are aware of the channels they can use to offer feedback or to seek out information.

Changes in policies and practices as a result of the plan should be publicized. A new or revised

employee handbook may be necessary, for example. Brochures on the program and on related areas — such as sexual harassment, career development and interviewing techniques — will help communicate the organization's commitment. Newsletters, or articles in internal bulletins and newspapers, provide additional opportunities. These and other communications tools, such as internal job postings, should be free of gender bias in language, tone and message.

Employers can also start to develop a strategy for external communications at this point. If one of the employment equity goals is to attract more women applicants, for example, outside recruitment efforts will have to change. Other external communications could include an acknowledgment of equal employment policies — in advertisements and at industry forums, for example.

Much of the communications work falls to the employment equity co-ordinator. The employment equity staff should consult managers and employees on both a formal and informal basis. It may also be the time to call on senior managers to reinforce the message in meetings, training sessions, seminars and round-table discussions.

Throughout the implementation stage, it is important to keep the lines of communication open. This allows the organization to hear feedback on the implementation process; to develop a shared understanding of the program; and to promote mutual commitment to it. It will also be useful in monitoring and adjusting the program and, later, in evaluating it.

Integrating the Program

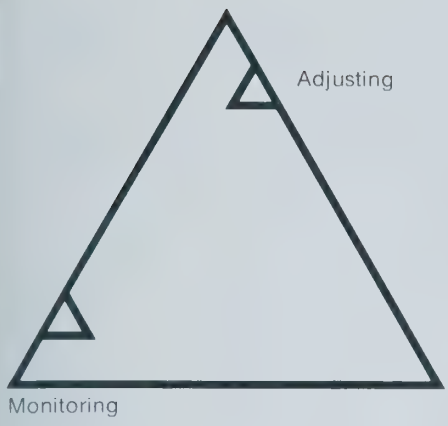
Integration of the employment equity program into an organization's overall management systems should be addressed in the implementation strategy. The pace and extent of integration will depend on the flexibility of existing systems. Organizations with personnel data bases, for example — regularly used for staffing, career planning and so on — will be able to use the information collected in the data analysis stage for employment equity planning purposes in order to monitor effects of the program. In many cases, the development of an employment equity program motivates an organization to become more systematic in its human resources management.

At Consumers' Gas Company Ltd., for example, it is the responsibility of every department manager to ensure that employment equity objectives are implemented. The company has incorporated employment equity goals into the strategic planning system, and the program's initiatives have been integrated into the company's business planning and accountability cycles.

This type of integration of employment equity management into overall management systems will increase the success of the program — but it will also improve the use of human resources and create a fair work environment for all employees.

'If you make management responsible for employment equity, just as if they were handling occupational health and safety, merit increases, pay levels or any other workplace issue, then they'll handle it.'

R. W. (Bob) Martin
President and Chief Executive Officer
Consumers' Gas Company Ltd.



organizational impact

Organizational changes are set in motion as an organization begins to implement an employment equity program. It is important, therefore, to assess the potential impact of the program at this point.

Some organizations have found that it is possible to see significant changes in the representation of women quite quickly. Others see that managers, previously reticent to change, develop enthusiasm for the benefits of new bias-free employment practices. The identification and acknowledgment of successful initiatives can work in a number of very positive ways. It can show that specific short- or medium-term goals can be met, and can demonstrate that longer-term goals can also be achieved. In addition, publicizing positive results can encourage women and maintain and increase the commitment of managers and all other employees.

Monitoring

Organizations with employment equity experience emphasize the value of a visible monitoring system — especially at the beginning of the program. Monitoring can be the responsibility of the employment equity co-ordinator. The co-ordinator will probably need close contact with line managers to support their efforts to implement the employment equity plan.

A monitoring system should work on a number of different levels. First, the system should be designed to assess the progress of the employment equity program while it is being implemented. Second, it should be used to evaluate changes in the overall status of women in the organization. Third, the monitoring system should be a management tool: to review goals; to fine-tune and adjust the program; and to identify problem areas or new issues as they emerge. Finally, the system should work in conjunction with the communications strategy to provide feedback on the program and to encourage commitment within the organization.

During the planning process, employers already will have thought about how to monitor the program. Existing reporting mechanisms may be an efficient way to gather some of the information needed to assess progress and keep senior officers informed. If regular management meetings are held, a report prepared by the employment equity staff person can be added to the agenda. If the personnel division provides monthly reports on staffing actions, information on hirings, promotions, terminations and so on can be broken down by sex. If employment equity goals have been integrated into the formal planning cycle, employers can assess employment equity goal achievement much like any other corporate goal — or employers may decide that special reporting mechanisms, implemented at the beginning of the program, will give it a higher profile.

Some of the information needed to monitor the program's progress is acquired through more informal channels. The employment equity co-ordinator may hold periodic committee meetings to review the impact of new policies on the status of women, or to discuss certain aspects of the program with managers or employees. The co-ordinator may attend job interviews or help review job applications. Ongoing support from line managers will provide invaluable feedback for assessing the program's effectiveness.

The monitoring procedure that an organization chooses will be based on the organizational environment and on the program activities set out in the employment equity plan. Here are some key questions, however, that will help you to monitor your program, no matter what method you rely on:

- Are targets being set and goals being met?
- Are new policies and practices being implemented?
- Are personnel policies consistent with human rights legislation?
- Are there fewer human rights complaints?
- Does the program need adjusting?
- Are alternative strategies more appropriate?
- Are new issues emerging?
- Is the program understood?
- Are managers supporting the program?
- Are employees supporting the program?
- Are sufficient resources assigned?
- Is the representation of women improving?
- Are women moving into non-traditional areas?
- Is the wage gap being reduced?
- Are more women applying for jobs?

Evaluating

Three important areas need to be assessed when an organization is evaluating the overall impact of its employment equity program:

- Changes in the corporate environment — in the climate and values of the organization
- Changes in employment systems — the policies and practices of the organization
- Changes in the employment status of women — their distribution and representation in the organization, and salary levels

Changes in the corporate environment include the reactions of employees to the program. Changes in attitudes — qualitative changes — can be assessed through employee surveys, interviews and the management appraisal process.

Periodic attitude surveys can provide insight into changing employee opinions and perceptions, job satisfaction, career development and training needs. At the University Hospital in London, for example, a recently completed study on the quality of worklife — the second such attitude study conducted — has prompted the establishment of the Quality of Worklife Committee and five sub-committees. Their mandate is to investigate areas of concern about the hospital's worklife. The sub-committees are addressing the issues of employee recognition, career counselling and development, stress management, employee development and patient and staff relations.

If employment systems have been targeted for change, employers will want to keep track of those changes. Interim reports on job transactions throughout the organization, or in specific divisions or units, can be prepared.

If the employment equity plan focuses on recruitment, then the numbers of applications, interviews and hirings can be examined for female representation. A qualitative review of changes in policies and practices can be compared to projected statistical outcomes. The review may also highlight the need for new policy guidelines.

Over the last 10 years, the City of Windsor has undertaken a number of initiatives to encourage the recruitment of women. In 1985, the city's personnel department published a recruitment manual. One of its major recommendations was to include women on interview teams, whenever possible, if women candidates were being considered. The personnel department particularly recommended this measure for selection panels choosing management, supervisory and non-traditional staff.

Lastly, and most importantly, employers will want to capture statistical or quantitative changes in the status of women within their organizations. Periodic workforce, job group, availability and job transaction analyses will allow the organization to compare results with the baseline data collected earlier.

Ortho Pharmaceutical (Canada) Ltd., a firm of approximately 260 people, has conducted annual employment equity audits since 1982, when it made a presentation to its management board. Components of the audits include: an evaluation of female representation by job category; a review of salary and administration practices; and an assessment of personnel policies and procedures.

'We reviewed our hiring and development criteria to ensure we were hiring and developing promotable women. Our focus in this area has resulted in increased female representation.'

Grant Leishman
Director, Employee Relations
Ortho Pharmaceuticals (Canada) Ltd.

Adjusting

A good monitoring and evaluation system will do more than help to assess the employment equity program. It should assist in the management of the program — in setting new goals and targets, in fine-tuning and adjusting the program, and in identifying issues as they emerge.

Modifying and adjusting the employment equity plan can be accomplished most effectively with input from line managers, employee and union representatives. Changes to the program that are based on suggestions and advice from all employees tend to increase staff commitment and investment in the program. Many of these adjustments can be made in an ongoing, informal manner or as part of the business objective review process — on the agendas of monthly meetings, and so on.

Informal feedback channels, such as open forums for discussion and women's networks, will also be useful in pinpointing problem areas and in managing them.

The employment equity co-ordinator will be in a position to flag potential problem areas; to bring them forward for senior management attention; and to make recommendations for new policies and procedures, if necessary. Employers can incorporate new issues and adjustments into the plan in a more formal way — as part of a year-end review, for example, or for next year's planning cycle. In this way, program renewal and increased corporate commitment to employment equity can be set in motion.

Communicating Results

There will be a need for more formal feedback mechanisms to keep all employees up to date on program developments. As part of the communications strategy, an employment equity annual report, based on the outcomes of the evaluation and goal-setting exercise, may be a useful tool. Interim or progress reports may suit the management style of the organization. Reports on special projects, results, or on the experiences of managers or employees may also be in order.

In addition, employers can publicize the organization's successes within its industrial sector or to the public at large. You may want to produce an article for your trade journal, for example, or arrange speaking engagements. You may want to nominate your organization for an annual Employment Equity Award sponsored by the Ontario Women's Directorate.

Use of the monitoring system to communicate the program's impact has a number of benefits. Employers can bolster internal commitment to the program. A policy statement from senior management, for example, acknowledges the organization's achievements and reaffirms the priority of the program. A more public approach — a section on employment equity in the organization's annual report, for instance — will serve to ensure that the program is seen as part and parcel of the corporate purpose. A broader public awareness campaign is likely to recruit more highly skilled women for your organization. Depending on the sector, promotion of employment equity activities in an organization could also have potential for marketing products and services.

Summary

This booklet concludes the discussion of the employment equity management process that began in the previous booklet. Taken together, Organizational Analysis and Organizational Change and Impact profile the issues, questions and approaches that will help to improve the status of women in an organization.

Employment equity programs work. Organizations with programs in place can point to a number of key factors that led to success:

- The framing of employment equity within the corporate purpose and in the human resources context
- Recognition of the internal and external organizational environment
- Establishment of strong, visible senior level support
- Appointment of appropriate management and staff to guide and oversee the program
- Collection of baseline information on the characteristics and distribution of the workforce
- Transferral of responsibility for employment equity to line managers
- Establishment of objective criteria for assessing personnel policies
- Establishment of flexible and attainable goals
- The setting of priorities based on available resources
- The monitoring and adjustment of the program on an ongoing basis
- Integration of employment equity within existing management systems

For practical examples, drawn from a cross-section of organizations with experience in employment equity, see the last booklet in this series, entitled Employment Equity Initiatives.

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Resources

Ontario Women's Directorate

Consultative Services Branch

The Ontario Women's Directorate is the agency in the Ontario government that co-ordinates the development and communication of programs and policies for women. Its aim is economic and social equality for women in Ontario.

The Consultative Services Branch of the directorate specializes in the area of employment equity. It is responsible for encouraging the planning, development and expansion of employment equity programs in Ontario's public and private sectors.

In order to achieve this goal, the branch provides a wide range of consulting services to employers who are either just beginning to initiate employment equity programs, or wish to enlarge those that are already established. Consultants offer employment equity strategies that are tailored to the organization's particular environment.

The services that this branch offers include:

- Workshops and seminars
- Technical guides and information
- Videos
- Advice on relevant legislation and government policies
- Opportunities to exchange ideas with other employers through networks and demonstration projects
- Recognition of success through annual awards in employer excellence

For further information, contact:

Consultative Services Branch
Ontario Women's Directorate
4th Floor, Mowat Block
900 Bay Street
Toronto, Ontario M7A 1C2
(416) 965-7785

Additional information about other special groups is available from:

Handicapped Employment Program
Ontario Ministry of Labour
10th Floor
400 University Avenue
Toronto, Ontario M7A 1T7
(416) 965-2321

Race Relations Division
Ontario Human Rights Commission
11th Floor
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(416) 965-1613

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- Sample planning format
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Managing Employment Equity

- Introduction to a Series
- An Overview
- Organizational Analysis
- Organizational Change and Impact
- Legislation — A Guide for Employers
- Employment Equity Initiatives

Ontario Women's Directorate

Honourable Ian Scott
Attorney General and
Minister Responsible
for Women's Issues

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organizational analysis

Managing Employment Equity

Ontario Women's Directorate

This is the third of a six-part series of publications on employment equity produced by the Ontario Women's Directorate. The first booklet introduces the series. The second booklet gives an overview of the employment equity management process. This booklet, **Organizational Analysis**, begins a more detailed look at the process. The fourth booklet, **Organizational Change and Impact**, completes an examination of the process. The fifth booklet is entitled **Legislation — A Guide For Employers**. **Employment Equity Initiatives**, the sixth booklet, features practical examples and ideas from organizations with experience in the employment equity field.

Organizational Analysis

The first step in the employment equity management process is organizational analysis — a review of the workplace and the people in it.

Organizational analysis is the foundation stone of the process, for it allows employers to gather all of the pertinent information they will need for the changes that lie ahead.

Organizational Change

The employment equity program — just like any program that results in significant change within an organization — must be handled with care and sensitivity.

It therefore requires careful planning and implementation if it is to be effective, if it is to be successful, and if it is to have a positive impact.

Organizational Impact

All good managers want to be able to assess the impact of change on their organizations.

They must consequently monitor the employment equity process as it moves through each step towards its ultimate goal — a workplace in which people are hired, trained, promoted and paid on the basis of merit alone.

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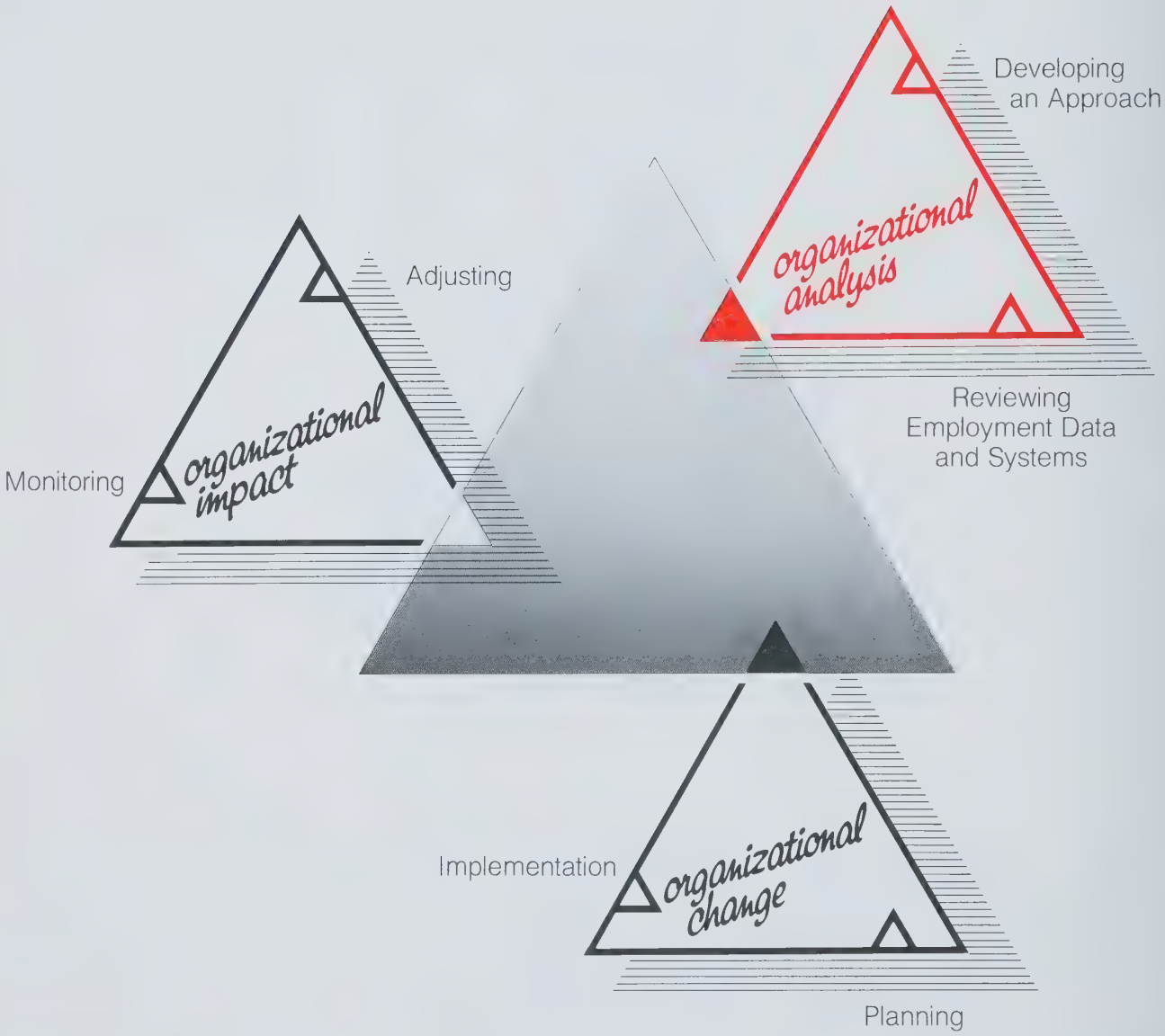
Employment Equity Management Process



Introduction

Organizational Analysis — the first major phase of the employment equity management process — lays the groundwork for the changes to come. Quite simply, this stage allows the employer to take a close look at the workplace environment and the employees who are part of it.

Even a tour of the plant or office and a review of payroll data can provide some basic information. How many women are on staff? How does the number compare to the total number of males? What types of jobs are female employees doing? Are they clustered in one or two occupations — or are they involved in a broad range of positions? How do their salaries compare to those of male employees?

For small companies or organizations this process may be quite simple. For larger companies it will involve a more formal, time-consuming approach.

Changes in an organization only happen through careful, step-by-step planning. Organizational analysis is an essential element in the planning process — it provides the diagnosis.

Fundamentally, its goal is to provide employers with basic information on where their workplaces stand in terms of employment equity. Once the current status is clear, the program's ultimate aims can be formulated with precision and clarity. Even while this period of information-gathering is going on, however, employers can be taking measures to move the program along. The employment equity program is not linear; that is, it does not depend on the completion of a strict sequence of steps or a complex system. It is adaptable to the organization — not *vice-versa*. If only certain segments of it apply to a specific workplace, these segments can be utilized and the overall program will be equally effective.

Similarly, difficult facets of an employment equity program can be put into practice simultaneously. More women can be trained for non-traditional occupations, for example, while personnel policies are being reviewed for any signs of discrimination in hiring or promoting.

The major tasks involved in organizational analysis include:

- Establishing senior level commitment
- Assigning staff responsibilities
- Assessing the corporate environment
- Developing a communications strategy
- Collecting employment data
- Reviewing personnel policies and practices

It is important to keep in mind that the time and effort spent at this stage of the employment equity process will pay important dividends. Organizational analysis creates a firm foundation upon which to develop and implement an employment equity program. It will allow the organization to introduce changes to the work environment in a careful, systematic manner.

Developing an Approach

- Establishing Senior Level Commitment
- Assigning Staff Responsibilities and Resources
- Assessing the Corporate Environment
- Developing a Communications Strategy

The goal of an employment equity program is to ensure that the organization is providing equal opportunity to all its employees — that it hires and promotes people on the basis of individual competence only.

While the concept of employment equity is plain and straightforward, making the concept a reality involves careful strategy. This is because employment equity can imply change to the work environment and *any* organizational change encounters some concern by employees. The beliefs, values and behaviour of an organization may be challenged by employment equity. Traditions are questioned. "But this is the way we've always done it," is a common objection to the replacement of an existing policy. Those who are initiating change must be prepared to understand why changes are beneficial and to persuade the organization that old attitudes must be discarded when they no longer fit the times.

In introducing employment equity to the workplace, it is essential to show sensitivity to the work environment. If you anticipate the type of resistance that is likely to occur, you will help your organization forestall problems before they appear. Many employers are unaware of the ways in which they can positively influence their staffs during the period of change.

Misunderstanding is often the reason, for example, behind resistance to organizational change. By informing staff, at the outset of the program, about its nature and its objectives, and by keeping them informed along the way, employers can prevent needless confusion and anxiety. One of the most effective ways to overcome resistance to organizational change is to educate people about it beforehand.

Encouraging employee participation in the program also makes good sense. Research has demonstrated that participation leads to commitment — not merely compliance — and it is commitment, after all, that will make this program successful.

Initiating the process involves undertaking a series of important steps that will result in an organization shaping its preliminary approach to employment equity. As well, the organization will be prepared for the changes that will result from the employment equity process.

Establishing senior level commitment and assigning staff and financial resources to the process communicates support and commitment to the concept of employment equity — crucial elements for program success. Assessing the organizational climate will contribute to developing employment equity strategies that address the overall corporate purpose. Developing a communications strategy will ensure that employees are informed and involved in the early stages of the process.

Establishing Senior Level Commitment

Establishing *visible* senior management support for employment equity, particularly at the chief executive officer level (CEO), is a major step in the employment equity program. If the program is openly backed by senior management, the rest of the staff will take it seriously.

Commitment is usually demonstrated by the development and distribution of an employment equity policy statement. This policy is most often crafted by the senior person assigned to employment equity in consultation with the chief executive officer and other senior management staff. It is then communicated and distributed to the entire organization.

As each organization will vary in its approach to employment equity, so policy statements will also differ. All policy statements, however, should have certain key components. They should:

- Designate target groups
- Acknowledge employment barriers
- Develop positive measures
- Assign responsibility for implementation
- Integrate employment equity and corporate planning systems
- Establish support mechanisms for the interpretation of employment equity policy

Texaco Canada's employment equity policy, shown below, illustrates one organizaton's approach.

Texaco's Employment Equity Policy

PURPOSE

To outline equal opportunity as it affects employee status and working conditions and to ensure that discrimination does not exist within Texaco Canada by providing equality of treatment and opportunity to all employees and applicants.

POLICY

1. Texaco is committed to providing equal opportunity to all individuals regardless of age, sex, race, religion, citizenship, marital status, family status, national origin, mental or physical disability/handicap or any other prohibited ground of discrimination. Texaco undertakes to identify and remove employment and advancement barriers, if such barriers exist, particularly with respect to "designated groups" identified as women, aboriginal people, persons with disabilities or handicaps, and persons who are, because of their race or colour, in a visible minority in Canada.
2. Furthermore, Texaco will take positive steps as necessary to facilitate the integration and promote the full participation of previously underrepresented designated groups in the company's workforce and to encourage the utilization of the talents of all employees in order to realize the business objectives of the organization.
3. Decisions about employment will be made on the essential skills, capability, knowledge and experience required to perform the job. Decisions about advancement will be based on performance in current position, as well as essential skills, capability, knowledge and experience required to perform the job.

RESPONSIBILITY

1. Texaco requires managers and supervisors to bear this policy in mind when making employment decisions. It is their actions and their commitment to fairness that will successfully create and maintain an environment where every employee has equal opportunity to work, receive training, develop and advance.
2. Any employee who is in a position to make or influence a decision affecting an employee's status or working conditions will be held accountable if it is found that he or she has directly discriminated. Direct discrimination results when individuals are treated differently because of age, sex, race, religion, citizenship, national origin, marital status, family status, mental or physical disability/handicap or other prohibited ground of discrimination.
3. Furthermore, an employee in a position of authority or influence will be held accountable to ensure his or her actions do not result in indirect discrimination. Indirect discrimination results when the application of a policy or procedure, which is not in itself discriminatory, has an unintended negative impact upon specific employee groups such as designated groups or other groups protected by human rights legislation.
4. The senior manager of each Department/Region/Plant/Location will ensure that his policy is communicated to all employees and applicants. In addition, he or she will ensure that all supervisors are trained so they can discharge their responsibilities in accordance with this policy and human rights laws.
5. The Employee Relations Department will be responsible for shaping policies and practices that are consistent with this policy, assist in identifying areas where action may be required to ensure the ability of designated group members to compete equally for jobs, providing training and guidance to managers and supervisors in human rights compliance and employment equity initiatives as well as promoting awareness of this policy among employees.

Employees should feel free to seek advice from their Supervisor, local Personnel Representative or the Co-ordinator Employment Equity, at Executive Offices as to interpretation or application of this policy.

The company's well-defined policy recognizes the need to go beyond commitment — to ensure that employment equity is a corporate priority for which both management and employees are responsible.

Texaco's policy includes a number of notable features. It indicates specific actions that the organization will take to ensure equal opportunity. Accountability is clearly communicated, along with the support systems available to the employees. Employment barriers are recognized, as is the importance of making employment decisions based on skill and merit.

Finally, but perhaps most importantly, the policy is linked to Texaco's business objectives. Integrating and promoting the full participation of previously under-represented members of their workforce is considered to be a way to realize the business objectives of their organization. This approach acknowledges employment equity as a priority for Texaco. Devoting human and technical resources to the program, then, will be judged crucial to its success.

Assigning Staff Responsibilities and Resources

Employment equity staff must have ownership of, and responsibility for, the program. In addition, sufficient resources must be allocated to them so that they can increase their knowledge and expertise.

In selecting program staff, a number of factors will be relevant. The organization's size, the degree of decentralization, the type of industry and its industrial relations, for example, should all be taken into account.

Organizations can choose one of the following approaches, or possibly combine them:

- Designate responsibility to line management
- Set up an employee task force or council, led by a senior personnel or human resources member
- Form a joint union-management committee
- Hire outside consultants to offer guidance

Responsibility for the management and co-ordination of the process should be assigned to one individual — either a current employee or a new staff member who has been hired specifically for the position.

This representative should:

- Understand the employment equity issue and show commitment to it
- Know the organization's structure and working environment
- Demonstrate a knowledge of human resources management and industrial relations
- Be fully aware of the issues surrounding organizational change
- Understand and be able to analyze basic statistics relating to the organization's workforce and the target groups
- Show good communication skills
- Have the status and ability to gain the cooperation of all levels of employees within the organization
- Be prepared to monitor, evaluate and report on the program's progress
- Have access to the CEO regarding the program and its goals

Management, too, has to fully recognize its leadership role as the employment equity team is assembled. Team leaders need to know that communication lines to both senior and line management are always open. Access to senior management is crucial to the program's effectiveness.

Managers and supervisors are the backbone of an employment equity program. They must be familiar with the program and its goals. Workshops, seminars or training sessions that focus on the issue of employment equity may be necessary to ensure that they understand why the program is being introduced and how it will work.

Senior management must be committed to employment equity objectives, and must be willing to take responsibility for achieving them. This will also include allocating the financial resources necessary to carry out the various program elements. Costs of a workforce analysis, for example, will need to be assessed. If an employee survey is being considered, resources will need to be allocated.

These roles are further defined in the next booklet in this series — Organizational Change and Impact.

Assessing the Corporate Environment

Each organization's written (and unwritten) rules, traditions, policies, practices, attitudes, structures, and so on, create that company's corporate environment. This environment has a direct impact on the employment equity policy and program.

An examination of the environment will provide an organization with information on how its values, beliefs, attitudes and behaviour affect the employment status of women. This kind of assessment acts as a building block for the program.

Information on the corporate environment must be acquired in order to develop and implement an employment equity approach that suits the organization's needs. In addition, some of the information collected will indicate the most effective means of employee communication and involvement.

Internal Factors

A number of internal factors affect an organization's approach to employment equity — its size; the composition of the workforce; the industrial sector: its economic health and whether the organization is unionized or not. These factors determine an organization's environment and provide direction for the proposed employment equity plan.

A unionized environment, for example, may encourage an organization to approach employment equity in a joint, or consultative, fashion. The current and projected economic health of an organization will affect both the resources allocated to the program and the priority and commitment assigned to it. Knowledge and understanding of the corporate environment will help identify the systems to be used in support of employment equity and the strategies that will be appropriate. It is essential to recognize both the potential opportunities and the obstacles presented by this environment.

Attitudes are an important part of an organization's environment.

- How do employees regard the employment equity program?
- Are department heads aware of management's commitment to the project?
- What are the viewpoints of female employees on their future within the organization?
- Are their beliefs the same as those of the male staff?

A company's environment can be gauged in a variety of ways. Committee and management meetings, for example, will provide employment equity representatives with useful information on the organization's value system and its attitudes towards employment equity. In addition, consultation with local representatives and provincial officers in a unionized environment will help identify both support and potential problem areas early in the process. Some organizations hire outside consultants to guide them through this stage. This approach has the benefit of showing employees that the program is a priority for the organization. It may also be a more objective way of identifying attitudes and values.

Organizations could use an employee survey to learn more about the corporate environment and how employment equity can be applied to it. This not only offers valuable insight on employee attitudes, but also encourages employees to become involved in the process and to make a commitment to it.

(An example employee survey can be found in the sixth booklet in this series — Employment Equity Initiatives.)

Ten years ago, Manufacturers Life Insurance Company conducted a company-wide survey on employees' perceptions and attitudes regarding equal opportunities for women. The survey allowed the company to identify the range of support and opposition to the issue.

It also helped to pinpoint obstacles that would require special attention. The survey found, for example, that older males, even some among senior management, were more inclined to oppose the advancement of women and to stereotype their roles. The company responded with training seminars, geared to specific groups in the organization, that focused on increasing employees' awareness of women's potential. Manufacturers Life, since those early days, has gone on to integrate employment equity practices throughout its human resources management system and is one of the winners of the Ontario Women's Directorate's Employment Equity Award of Excellence. Periodic employee surveys continue to be part of that process.

External Factors

External — as well as internal — factors that affect the organizational environment must also be taken into account. They can have considerable impact on the development of an employment equity approach. A checklist of external factors is given below.

Checklist

Legal Considerations

- What federal and provincial employment laws affect you?
- What implications do these regulations have for your organization?
- Are you subject to federal or municipal contract compliance programs?
- If so, how do these affect your organization?
- What impact will future employment laws, such as pay equity, have on your organization?

Economic Conditions

- What are the economic directions for your organization?
- Does your organization plan new business or products that will require new employee skills?
- What is the economic outlook for the province?
- How is the labour market going to be affected?
- Will changes in retirement policies in your organization offer new opportunities for women workers?
- What is the economic outlook for your sector?
- Are you expanding or downsizing? How will this affect your workforce?
- What is the economic position of women in Ontario? In your sector?

Political Considerations

- What is the political climate regarding employment equity, pay equity and contract compliance?
- Does your organization have a reputation for dealing fairly with its employees?
- What are the future directions in political policy likely to be?

Demographic Issues

- What general trends will affect your organization's workforce?
  For example — aging, population, baby boom generation, changes in family structure, and so on?

Developing a Communications Strategy

A communications strategy is essential to the support of the employment equity process. An employment equity program will not work unless employees are fully aware of the program and see it in action. When a communications strategy is well designed and executed, it smooths the way for the introduction of the program into the workplace.

The aim of the strategy is twofold: to inform employees about the employment equity policy; and to involve employees in the identification of issues and in development of solutions relating to this program. This feedback from employees will result in a more effective employment equity plan and program. It will also contribute to an overall improvement in the organization's human resources management system.

The policy statement can be the first opportunity to inform employees about the program's introduction. It should be accompanied by additional information explaining why the organization is committed to employment equity; which personnel policies may change; and how employees might be affected by these changes. It is also important to tell employees about specific activities that will take place at this stage — such as employee surveys, a workforce analysis and a personnel policy review. Employees should also be assured that information collected at any time will be held in confidence and used only for human resources management.

Many organizations have realized the value of keeping their employees up to date on the program from the very start. Employees are more likely to share management's support and enthusiasm for an employment equity program when they have been consulted and informed at every available opportunity. Any objections to the program are also raised and managed more easily when they emerge early in the process.

Information about the employment equity policy can take the form of newsletters, brochures, audio-visual messages, bulletins, progress reports, meetings, committees and so on. (Videos and films on employment equity, as well as literature, are available from the Ontario Women's Directorate.)

Seminars for managers and employees, informal lunch-time forums, interviews and surveys, women's networks and union consultations are other useful avenues of communication. Providing forums for discussions on issues and concerns will help management plug into important issues right away.

Women employees are a prime source of information about barriers to advancement. One-on-one confidential interviews with selected employees can provide valuable insight into women's beliefs about an organization's performance on this score. Some organizations establish a women's network. This network can be a resource for consultation and training sessions and it can also provide a communications outlet.

As it is usually line managers who set the tone for any change in corporate policy, management orientation is critical. Special information packages and training and awareness sessions will educate managers on the program's importance. When management is solidly behind the issue, employees will be more confident about corporate commitment. Some companies, for example, offer training sessions on employment equity and human rights legislation, including guidelines on how to interview job candidates using non-discriminatory techniques.

Reviewing Employment Data and Employment Systems

In order to complete the profile of an organization's current position in relation to employment equity, its staff and policies should be reviewed and analyzed. The equity audit is a formal method of surveying the workforce: a framework for setting goals and targets as well as measuring improvements. The personnel policies audit identifies barriers to employment opportunities for women — barriers which may be unintended but nevertheless discriminate against women. These two measures indicate the areas in need of improvement — and the ways this improvement can be achieved.

The direct benefits of these reviews are an improved data base on all employees, and a fair and equitable human resources management system. Taken together, these benefits mean better employee morale and increased productivity.

Equity Audit

The **equity audit** is a comprehensive analysis of an organization's workforce. This section outlines the various steps for collecting and analyzing employment data. (The Ontario Women's Directorate offers further information on this subject in it's Employment Equity Workshops for Practitioners Manual.)

The equity audit provides vital information about an organization and the status of women within it. A comprehensive audit will show where women work in the organization; whether they are concentrated in a few job categories; and how well the organization has tapped the pool of qualified women in the external labour market. It will also demonstrate how women fare as they move into and through the organization.

But a good equity audit can do more than provide a picture of the status of women. The numbers can act as a useful trigger for understanding the issues raised by employment equity. They identify outdated management attitudes about work patterns, ambitions, job potential and the training or skill development needs of women employees.

'The numbers often tell the story to senior management in a way that nothing else can. The numbers help to counteract the myths about women and work. They give you an awareness of the situation. But they also help people to see the problem as their own — as a management problem that can be solved.'

Paul Scott
Director, Equal Employment Opportunity
Municipality of Metropolitan Toronto

The Necessary Data

To undertake an equity audit, an organization needs three major kinds of employee data:

- **Stock** data show where women are employed in the organization, their salaries, status and occupations. They illustrate the current status of women in the organization.
- **Flow** data indicate the relative distribution of women in job applications, terminations, recruitment and selection, training and promotion — in short, the job transactions of the organization. These data trace women's movement — or lack of movement — into and through the organization.
- **Availability** data indicate the number of qualified women in specific geographical recruitment areas.

Stock and flow data are internal workforce statistics. Availability data are external labour market statistics.

There are four basic steps involved in collecting and analyzing workforce statistics for the equity audit:

- Workforce profile (stock data)
- Job group profile (stock data)
- Availability profile
- Job transaction profile (flow data)

Workforce Profile

The first step — developing a workforce profile — provides a current snapshot of your organization. It shows the *job title, salary* and *sex* of everyone in your workforce. Employers should also analyze the standard progression lines for each job title. Smaller employers may look at their entire organization. Larger employers may decide to begin by collecting information within specific divisions or units: for example, head office.

Sources for collecting job title, salary and sex include *payroll data, personnel files, computerized personnel data banks* and *collective agreements*. Information on education, experience, full-or part-time status and on job classification or level will prove useful in setting goals and targets for women's advancement in the organization.

Workforce Profile Checklist

Once you have collected the information, what will it tell you? It should answer such questions as:

- Are women adequately represented in higher-paying jobs?
- Are there specific departments or units without any women in higher positions?
- Are women visible in positions leading to higher level jobs?
- Are women being paid the same entry-level salaries as men doing the same jobs?

Job Group Profile

The next step, takes the information from the workforce profile and categorizes it using broad occupational groupings — such as senior level managers, clerical staff, technicians and so on. Here, the distribution of women in each job grouping will indicate whether or not women are concentrated in a few jobs. (This is the historical pattern.) These jobs will traditionally tend to hold low status within the organization.

You may discover, for example, that women hold 25 per cent of the supervisory jobs, 10 per cent of the middle management jobs and two per cent of upper management jobs. If you then analyze promotion and selection procedures, you will probably find some specific barriers to women's advancement.

Occupational groups are defined by information such as similarity in content, salaries, responsibilities and career paths. Some employers will already have job classification systems that can act as a useful basis for the job group analysis.

To compare the results with the industry standard or with the external market as a whole, use generic job categories as a yardstick. The main source for these listings is Statistics Canada. It has developed standard categories, called Standard Occupational Codes (SOC), that reflect data collected from relevant surveys. There are over 500 such occupational categories. These 500 categories have been collapsed into 12 occupational groups, known as the Abella occupational groups, which are often used to track employment equity progress. For more detailed information about the SOC or the Abella groups and how to use them, contact Statistics Canada, the Ontario Women's Directorate or the Canada Employment and Immigration Commission.

Job Group Profile Checklist

Once you have developed your job group profile, what should you be looking for? Some of the issues include:

- Are women concentrated in one or more job groups?
- Are women under-represented in one or more job groups?
- Are there specific departments or units where women are concentrated or under-utilized?
- Are there promotional routes open for women to move into other job groups?
- Are women's salaries equivalent to those of men for work that is similar in skill, effort, responsibility and working conditions?

Availability Profile

The next step compares the job group profile with the representation of qualified women in the external workforce. This comparison is called a utilization analysis.

Information on the availability of women in the external labour market can be obtained from the Ontario Women's Directorate; Statistics Canada; Employment and Immigration Canada; Local Canada Employment offices; training centres; colleges and universities; and professional associations. This information is available by SOC code or Abella groups.

There are three important factors to keep in mind when conducting this analysis. For each occupational group, one must consider the:

- Normal recruitment area for the occupation
- Skills required for the job
- Internal pool of candidates

The normal recruitment area will vary depending on the occupational group and salary level. For management and certain skilled jobs, the recruitment area may be nation-wide. For semi-skilled or unskilled jobs, the local area may be the recruitment base.

The skills required in the job are determined by the job description.

The internal pool of candidates should also be addressed in the availability analysis. Employers should ensure that all individuals with general qualifications and potential for development are considered for promoting, training, transfers and so on.

In brief, an analysis of availability can be used in three important ways:

- To establish a standard of comparison for an organization's employment of women
- To establish realistic goals for the employment equity program
- To determine strategies to increase the pool of women candidates for specific jobs

When recruiting for unskilled workers, for example, you could find that women make up 50 per cent of the available local labour force. Yet when you take a look at your applicants, you may discover that women are not applying for these jobs. You can then work on solutions to boost the number of women applying in these specific areas.

Once you have collected the information for the availability profile, it will address these questions:

Availability Checklist

Once you have collected the information for the availability profile, it will address these questions:

- Are women under-represented in your organization? In which occupations. To what degree?
- Are there internal promotion strategies that add to this under-utilization?
- Which job groups show the least number of women?
- Are there recruitment strategies that could increase women's representation?

Job Transaction Profile

The job transaction profile traces women's progress within the organization. This analysis can be done at the same time as the personnel policy and practices review. Employers should look at the number of women:

- Applying for jobs
- Qualified
- Interviewed
- Hired
- Trained
- Terminated

Recording the flow of women in and through the organization can be useful at the start of the employment equity program — to identify barriers and analyze any noticeable patterns. This method is also helpful, however, once the program is in place. It monitors the employment equity program's success and reminds managers of their roles in maintaining it.

Job Transaction Checklist

- Are there women candidates for the job in question?
- What is the female rate of success in filling this job, compared to that of men?
- Is the success rate of women lower than it should be?
- Where can improvements in policies and practices be made?

Insights obtained from the analysis of the audit process should point to policies and practices which require a closer examination.

If the workforce and job group profile, for example, has indicated high female participation rates in the secretarial/clerical grouping, but low numbers of women in middle management, then a review of training and development, promotions and upward mobility policies should be the first priority. If the availability analysis has shown very few women being recruited at entry level positions, an examination of job classification and recruitment policies may help pinpoint particular problem areas.

Equity Audit Summary

NOTE:
1. Steps are not necessarily sequential
2. Outcomes at any stage could indicate possible action

STEP	INFORMATION REQUESTED	TASK TO BE PERFORMED	OUTCOME	DATA SOURCES
WORKFORCE PROFILE	• Job title • Sex • Salary level (optional) • Education • Experience • Job classification level	• Listing of each job title, sex and salary of occupant • within department/division/unit • job title showing internal career path	• Picture of the representation of women in your organization by department and job title	• Payroll data • Personnel files • Centralized computer records • Collective bargaining agreement

STEP	INFORMATION REQUESTED	TASK TO BE PERFORMED	OUTCOME	DATA SOURCES
JOB GROUP PROFILE	• Workforce profile • Standard Occupational Codes (SOC) • Abella groups	• Grouping internal job titles into groups, i.e. Abella categories 1. Upper Level Managers 2. Middle Level Managers 3. Professionals 4. Technicians and Semi-Professionals 5. Supervisors 6. Foremen/Forewomen 7. Clerical 8. Sales 9. Service 10. Skilled Crafts and Tradespeople 11. Semi-Skilled Manual Workers 12. Manual Workers	• Picture of the distribution of women throughout your organization	• SOC and Abella grouping sources: • Consultative Services Branch, Ontario Women's Directorate • Canada Employment and Immigration Commission • Statistics Canada • Public Libraries
AVAILABILITY PROFILE	• Job group profile • External job group profile	• Comparing internal participation of women with external participation rates	• Picture of the distribution of women in your organization compared to the external market	• Availability Data Sources • Consultative Services Branch, Ontario Women's Directorate • Canada Employment and Immigration Commission • Statistics Canada • Professional associations • Colleges, Universities • Training programs • Internal positions
TRANSACTION PROFILES Competitions	• For each new hike or promotion — Number of men and women: Applied Qualified Interviewed Hired	• Collection and presentation of data on competitions, winners and promotions	• Picture of whether more or fewer women are being brought into the organization or promoted within	• Competition/Waiver files • Position files

STEP	INFORMATION REQUESTED	TASK TO BE PERFORMED	OUTCOME	DATA SOURCES
Training	• Number of men and women receiving training and $ spent by type of training	• Collection and presentation of data on training, by type of training	• Picture of whether resources are being applied to train men and women equally	• Personnel files
Turnover	• Vacancies and terminations, by sex, by occupation	• Collection and presentation of turnover data	• Picture of whether men or women are leaving the organization, and at what level	• Personnel files • Position files • Exit interviews

Personnel Policies Audit

Overview

The personnel policies and practices of an organization determine how the workforce is recruited, managed, developed and rewarded. They are instrumental in achieving corporate goals. They are also instrumental in the achievement of employment equity goals.

A review of employment systems will identify policies and practices that act as hidden barriers to employment opportunities for women. Although employment policies and practices may appear to treat men and women equally, their impact may, in fact, be quite different. If an organization's workforce is dominated by male employees, word-of-mouth recruiting will probably limit itself to men, for example. This systemic — or unintentional — discrimination will automatically screen out potential female employees. Job descriptions and job evaluation systems that undervalue positions traditionally held by women are also discriminatory.

Traditionally, most organizations have favoured hiring white, able-bodied men — except for those positions defined as "women's work." Employment practices often continue to reflect such stereotyping. They can become so entrenched that they are never questioned or changed. New workers are recruited and selected; current employees are evaluated and promoted; and conditions of employment are determined — all on the basis of policies and practices that may discriminate against women.

The potential impact on women of this "systemic" discrimination is considerable. It is also illegal in Ontario. The Human Rights Code provides protection from the impact of systemic discrimination. (For more detailed information, please refer to the booklet in this series entitled **Legislation — a Guide for Employers**.)

An employment system that is fair and equitable, on the other hand, benefits both the organization and the employee. A system that recruits, trains and promotes the best available talent moves an organization closer to realizing its corporate objectives. In addition, an objective employment system improves both the productivity and the morale of employees. The organization will have a more equitable and representative workforce; employees will operate in a more equitable environment.

Examine your organization's employment and personnel policies and practices for any evidence of discrimination. Are women reaching the interview stage, or are they being put out of the running much earlier? What job qualifications are essential? Are some non-essential qualifications — height and weight restrictions, for example — screening out qualified female applicants?

There are a number of staffing decisions for which most organizations have developed policies and practices. They include:

- Job classifications and descriptions
- Recruitment
- Selection
- Job evaluation
- Salary administration
- Training and development
- Compensation levels
- Performance appraisals
- Promotions and upward mobility
- Access to benefits
- Discipline procedures
- Terminations and layoffs
- Collective agreements

Every one of these areas should be reviewed, using the following guidelines:

- Is the policy job-related? Is it a practice based on actual occupational requirements?
- Is the policy valid? Does the required qualification have a direct relationship to job performance?
- Is the policy applied consistently? Is it used the same way every time it is applied, or is it an arbitrary practice?
- Is it a business necessity? Is it necessary for the safe and efficient operation of the organization?
- Is the policy legal? Does it conform to human rights and employment standards legislation?
- Does it have an adverse impact? Does it affect the females in an organization negatively?

Recruitment methods could be examined, for example, to determine whether enough women are applying for openings and whether their applications cover a satisfactory range of jobs, given the number of women in the labour market. If the evidence indicates that women are under-represented, then specific methods of recruitment will need closer scrutiny.

Internal job postings, for instance, encourage current employees to apply for openings. But if *past* hiring policies already excluded eligible women from the organization, posting job opportunities internally will not recruit women from the existing workforce. Thus, while this recruitment method appears to be equitable, it has a negative impact on women.

Training and development policies can also engender discrimination. An organization's training and development policy may use a salary cutoff, for example, as a way of limiting access to certain kinds of training. Because most women in the organization earn less money than men, only certain groups of employees are then eligible for the training — and these groups are primarily male.

The ways in which policies are interpreted, practiced and implemented should also be carefully reviewed. Personal biases, attitudes and assumptions that promote stereotyping can undermine the best of formal policies. If, for example, a job involves travel and a personnel officer concludes that female candidates would be unable to meet this requirement, women will not break into the position regardless of written policy

The appendix at the end of this booklet offers detailed guidelines on assessing all of an organization's employment policies and practices. In addition, *Achieving Employment Equity — Practitioners' Workshop Manual* is published by the Ontario Women's Directorate for workshop use and includes information on the same subject. A questionnaire is available from Employment and Immigration Canada to help employers to review their employment systems. (See the bibliography at the back of this booklet.)

Case Study

In 1976, a task force at Manufacturers' Life Insurance Company examined the position of women in the organization. Part of that examination included a review of some employment policies and practices. The task force focused on salaries, benefits, performance appraisals, recruitment strategies, and on training, development and promotion policies.

Manufacturers' Life Employment Systems Review

POLICY	EXAMINATION
Salaries	• Does this organization pay equal pay for comparable work?
Benefits	• Are employees treated equitably in terms of fringe benefits?
Performance Appraisals	• Is the evaluation process free of bias?
Recruitment	• How do the hiring practices affect women?
Training/Development	• Are equal development opportunities available ?
Promotion	• What are the promotional opportunities for women as compared to men?

The task force then made recommendations designed to improve the status of women by improving these policies and practices. They recommended, for example, that managers develop and implement employment policies in a fair and equitable manner. Their *Managers' Reference Guide* included practical information on making employment practices gender neutral and objective. Interviewing guidelines were offered, as well as information on human rights laws, so that interviewers could avoid discriminatory questions and focus on job-related issues.

Appendix

Employment Systems

A: Job Evaluation

Job evaluation is undertaken to determine the relative importance of different positions within the organization. The emphasis is on the value of the job itself, in terms of duties and responsibilities, rather than on the value of the employee in the job. Job evaluation forms the basis on which relative compensation is determined. As it also involves defining the tasks and duties of the job and the requisite skills required, it is the cornerstone on which other employment decisions concerning recruitment, selection, training and development, and wages and benefits are based.

Many organizations apply different evaluation methods for different job groups. A non-quantitative approach, such as ranking or classification, is often applied to secretarial, clerical, and semi-professional labourer groups, while a quantitative or analytical approach is used in evaluating higher-level groups. For example, a point system or a factor-comparison approach may be used for executive, professional, and technical positions. Use of these different evaluation methods does not, however, permit comparison of jobs across sector lines.

Although a quantitative evaluation approach may be more objective than a non-quantitative one, it is important to realize that job evaluation always involves subjective judgment. No job evaluation system will guarantee entirely accurate results. The outcome will depend on the skill exercised by those applying the system.

The purpose of job evaluation is to describe an organizational hierarchy based on the relative value of jobs. There is a tendency, however, for job evaluators to incorporate bias by undervaluing jobs traditionally performed by women. Section 11 of the Canadian Human Rights Act seeks to address this problem by requiring employers under the jurisdiction of the federal government to pay men and women equally for "work of equal value." This requirement also exists in the province of Quebec. In all other provincial and territorial jurisdictions, the standard for equal pay is the narrow definition of work that is "substantially the same." The practical effect of the narrow standard is that only jobs that are similar in nature are compared. Traditionally, men and women enter different occupations; therefore, the demands of jobs held by women are not usually compared with those jobs held by men.

Potential sources of discrimination in the job evaluation process and plans include the following:

- Unconscious bias on the part of the job analyst
- Rating by one person rather than by committee
- Use of subjective rather than quantitative methods of analysis
- Inaccurate or incomplete job information
- Built-in bias in the evaluation system
- Comparisons limited to occupational categories rather than to all jobs in the organization

B. Recruitment

The objective of recruiting in all organizations is to attract the most qualified job applicants. The time and cost involved in selection procedures are important considerations, and many organizations will retain applications only from those perceived to be the most suitable candidates.

If assumptions about the characteristics of desirable candidates are discriminatory in nature, this will be reflected in the choice of recruitment channels and procedures. Many organizations tend to follow recruitment methods that have been successful in the past. If the firm has traditionally employed few women, native people, or disabled persons, present recruitment methods may be contributing to the continuation of this pattern.

Recruitment methods should be examined with a view to determining whether women, native people, and disabled persons are applying in sufficient numbers and for a sufficient range of jobs, given their present availability in the labour market. If an examination of job application patterns reveals that members of the designated groups are under-represented, then methods of recruitment should be examined. It may be that the recruitment channels chosen by the organization are not accessible to most minority groups, or that job information is presented in such a way as to discourage their application. Just getting as far as the selection process has been identified as one of the major employment problems of members of the designated groups.

Several methods of job recruitment that may affect the recruitment of members of designated groups are examined below.

1. Internal Recruitment Methods

Promoting the Person Next in Line. Vacancies are often filled by simply promoting the individual next in line in the organizational hierarchy. If feeder positions have not, as a matter of course, been filled by employees who are members of the designated groups, they will not have access to higher levels within the organization. Seniority systems are another form of promoting the person next in line. However, the determining factor in a seniority system is "years of experience" rather than "position in the hierarchy." Seniority systems frequently operate to the disadvantage of members of the designated groups, since they have had fewer employment opportunities in the past.

Internal Job Posting: This method has the advantage of making the recruitment process open and visible. However, if there are few eligible female, native, or disabled candidates within the organization because of past hiring policies, this method will not be effective in improving the representation of these groups.

Inventories: Employers sometimes fill vacancies by referring to a skills inventory which gives information about the abilities and career interests of their employees. Inventories have three potential shortcomings. They are open to considerable subjectivity in candidate selection and thus vulnerable to overt discrimination. They are not always comprehensive; employees at all levels may not be included. Inventories sometimes have arbitrary boundaries, for example, they may include only management employees or those above specified salary levels. These practices tend to exclude many members of the designated groups.

2. External Recruitment Methods

Word-of-Mouth Referrals. Organizations sometimes rely heavily on referrals from relatives or friends of current employees. This practice tends to replicate the pattern of the organization's current workforce. It can have an ad-

verse impact if members of the designated groups are currently underrepresented.

Walk-ins. Another method of recruiting is to rely heavily on applicants who simply walk into an employment office. The effect of this practice depends on the location of the organization, particularly its employment office. A company or employment office located in a middle or upper-class suburb will not, according to current demographic patterns, attract a significant pool of native applicants. Similarly, if physical access to the employment office is difficult, disabled persons may not be able to submit applications. In addition, this method resembles word-of-mouth recruitment in that the organization does not actively invite applications, and therefore tends to perpetuate employment patterns.

Advertising. Employers can choose from a wide range of media when they advertise vacancies, including daily newspapers, trade publications, professional journals, community newspapers, and radio. The choice of media will determine the audience. The choice of text and illustrations for job advertisements can convey preferences as of age, gender, and physical ability. Pictures that do not include women, native people or disabled persons, or that depict them only in stereotypical roles, will not be effective in attracting applications from members of the designated groups.

Employment Agencies. The private employment agency that an employer elects to use will determine the pool of applicants. Because private agencies are in the business of promoting high-profile clients, they tend to exclude members of the designated groups.

Schools. On-campus recruitment is a common way of attracting new graduates. However, recruitment that is limited to faculties in which the population is predominantly male is obviously a disadvantage to women.

Unions. The recruiting practices of employers whose establishments are unionized are influenced, and sometimes determined, by union agreements. Some collective agreements require that only union members may be recruited for vacant positions. In other cases, recruits must join the union when they are hired or the union itself may recruit employees through a union hiring hall.

In many unionized occupations and industries — for example, the skilled trades and the construction industry — there were, until recently, formal and informal barriers to the employment of women, native people, and disabled persons. Restrictions on external recruitment based on union agreements may present a real barrier to enlarging the participation rate of members of the designated groups. It may be possible to negotiate a solution to this problem with the union(s) involved.

Professional Associations. Some professional associations provide employment advertising and candidate referral services for their members. As with other recruitment methods that involve inventories, there can be unconscious bias in the selection of candidates for referral.

C: Selection Standards and Procedures
Discriminatory selection standards and procedures may be screening out qualified female, native, and physically disabled job applicants.

The selection process is open to discrimination of two basic types:

- The process itself involves continual evaluation of applicants against each other and against the selection standards. Each time candidates are evaluated there is potential for discriminatory impact.
- In many instances, selection standards themselves are not based on job requirements or tested for disparate impact and validity.

The selection process may go through several steps with different objectives.

1. Pre-screening Procedures
Aptitude tests, application forms, and general interviews are used by organizations to screen out unqualified candidates. However, these procedures may also screen out qualified applicants.

When the organization is faced with more applicants than it requires, it may use "cheap screening" devices to reduce the number of candidates. Non job-related requirements, such as arbitrary standards of education or work experience, may be used. In many cases, these requirements have an adverse impact on members of the designated groups. For example, some applicants will be screened out by a requirement for completion of Grade 12 education; others re-entering the labour force will be screened out by the requirement for recent or related work experience.

Many members of the designated groups are also screened out by educational, cultural, and physical work standards based on arbitrary concepts of the ideal worker. Such concepts are likely to be based on the typical worker employed in similar positions. In most cases, the employee is male, white, and not physically handicapped. Discrimination of this kind may not be intentional; it is part of a system that has developed over time.

It is important to note that these standards, like cheap screening devices, are generally not related to ability to perform a job and that the individuals who are screened out may be as qualified as those who survive the selection process.

Reception Procedures. Discretionary powers of accepting or rejecting applicants granted to untrained receptionist personnel may leave a company open to charges of overt discrimination. The atmosphere of the reception area and the attitude of the person receiving applications contribute to the comfort level of job applicants. An unfriendly atmosphere can result in candidates not submitting applications.

Pre-Screening Tests. Some organizations administer a general aptitude test to all job applicants as a screening device. Such tests are often not job-related and may in fact screen out qualified candidates. In addition, many standardized tests are culturally biased. Tests that require physical ability or dexterity to complete, although these skills are not related to the job, can screen out qualifed physically handicapped applicants.

Pre-Screening Interviews. Pre-screening interviews that are general in nature, rather than specifically job-related, can result in candidates being screened out on non-job-related grounds. The personal bias of the interviewer may also be reflected in the choice of candidates.

Application Forms. Application forms that require a candidate to provide information that is non-job-related can screen out applicants on a discriminatory basis. The inquiry may also be illegal if the information requested is counter to human rights legislation.

2. Interviews.
Interviews are the part of the selection process where the impact of discrimination is most obvious. Discriminatory questioning and subjective or biased rating criteria are examples of intent discrimination. Many factors, such as personal appearance, mannerisms, tone of voice and speed in responding to questions, influence the outcome of the interview.

There are numerous concerns about the interview process itself. The environment in which the interview takes place, the composition of the interview board, and the manner in which candidates are made to feel at ease all affect the outcome. An organization's selection process will be largely determined by the selection standards and procedures that are used. These may not be discriminatory in themselves but may still have an adverse impact on members of the designated groups. This can result in ineffective use of human resources, possible legal liability for the organization, and a lack of opportunities for members of the designated groups.

D. Training and Development

Training and development policies determine access to the opportunities offered by the organization. Admission to training programs is frequently based on factors such as seniority, status, salary, or occupation. Such criteria, which may appear to be neutral, often eliminate members of the designated groups.

An employer's objectives in providing opportunities for training and development are:

- To improve current job performance
- To identify and groom employees for future opportunities and responsibilities
- To assist employees in their personal growth
- To reduce costs associated with recruiting and integrating new employees.

Types of training and development that organizations may offer include: on-the-job training, institutional training, apprenticeship plans, career development assignments, job rotations and in-house training courses. In addition, tuition fees may be reimbursed or leaves of absence arranged so that employees can further their education.

An organization that recruits mainly at the entry level and determines upward mobility by training and development must ensure that all staff have access to these programs.

Many training and development policies have the potential for discriminatory impact. In examining policy, a close scrutiny should be made of the areas described below:

1. Limited Access

An organization can unintentionally limit access to training and development by imposing artificial barriers. To provide training that is related only to an individual's present position will not furnish a basis for career progression. As well, the definition of "job related" tends to be more flexible as employees move up the ladder. It is generally easier for an administrator or supervisor to relate management courses or university credits to a job than it is for a clerk, secretary or technical support employee.

One discriminatory practice is to use arbitrary limits based on salary, or level, within the organization when assessing eligibility for training. Cutoffs based on salary or status appear to be neutral but probably have an adverse impact on members of the designated groups due to their current employment status.

Training and development policies that are open, that is, without restrictions as to job-relatedness, salary, or occupational category, may still operate to the disadvantage of members of the designated groups if access depends on the subjective judgment of individual managers or supervisors.

2. Information Flow

The way in which information about the organization's training and development policy is disseminated also determines access for various groups. Information may not be accessible to all workers. For example, information about training and development filtered through managers may reach only selected employees.

3. Non-Job-Related Requirements

Training is sometimes limited to persons who meet criteria that may not be related to their present or anticipated position. Age and previous education are common restrictions.

4. Hostile Training Environment

A hostile training environment will have an adverse impact on the success rate of the group experiencing the hostility. For example, if an employer wishes to improve the employment status of native workers and takes steps to do so by enrolling more of them in company training courses, these objectives can be thwarted in an unreceptive training environment. Similarly, female apprentices will have higher attrition rates in unsupportive environments.

E. Upward Mobility Systems

Criteria used by an organization to determine employees' qualifications for developmental or promotional opportunities depend on the organizational climate as well as external societal factors. Systems that appear fair and neutral may prove to be inefficient and inequitable in practice. They may, in fact, restrict opportunities for advancement for members of the designated groups. In many instances, there is considerable scope for subjectivity or bias in selecting candidates for developmental or promotional opportunities. Personnel records may reveal that a smaller proportion of members of the designated groups are regularly selected for formal training and development programs or for various on-the-job mechanisms such as transfers, job rotations, and special assignments, all of which enhance job mobility. All upward mobility systems should therefore be examined for systemic or intentional discrimination.

1. Promotions

Most organizations promote employees on the basis of merit. Yet the deployment of members of the designated groups in general suggests that upward mobility systems are not operating equitably.

The potentially discriminatory nature of promotion systems parallels the way in which recruitment and selection policies and practices operate to the disadvantage of under-represented groups. Promotion systems frequently fall short from an equal opportunity perspective for the reasons discussed below.

2. Seniority

Seniority is often a major factor in promotion. Seniority rights that were won by unions have traditionally been regarded as non-negotiable. While it may seem logical that promotional rewards go to long-serving, experienced employees, seniority systems also tend to perpetuate the effects of past discrimination against members of the designated groups and thus contribute to systemic discrimination.

When seniority is based on length of service in a particular job or unit, rather than in the organization as a whole, it is particularly disadvantageous to members of the designated groups. Members of the designated groups are usually concentrated in low-paying jobs where lines of progression are limited. No amount of seniority will make these employees eligible to apply for jobs in the technical or management fields if the seniority lines are exclusive and no bridging positions exist.

3. Developmental Placements and Assignments

Developmental placements and assignments are a common way of grooming "fast track" employees identified as having potential for higher-level positions. This type of grooming can take many forms — job rotations, secondments, transfers, or special assignments. The impact of these on members of the designated groups depends on the same factors as the impact of promotional policies and practices. On-the-job development will not improve the status of women, native people, or disabled persons if their access to these opportunities is restricted by unnecessary barriers; or if subjectivity and bias play a part in the choice of candidates.

F. Wages and Benefits

Wages and benefits packages are complex matters where equity is concerned. Legal requirements and exemptions vary in different jurisdictions. Benefit plans, in particular, may involve differential treatment based on:

- Actuarial factors relating to sex, age, or disability
- Social factors, such as marital status and dependants
- Organizational factors, such as level in the organization

It is advisable to consult with the relevant labour department and/or human rights commission to discuss these issues.

1. Wages

There is a basic legal requirement of equal pay for men and women who perform work that is "substantially the same" (under the legislation of most provinces) or "work of equal value" (federal jurisdiction and the province of Quebec). Companies take many fac-

tors into consideration in establishing wage rates for jobs.

Probably the two most important factors are the current labour market supply and compensation rates. Generally, the salary rates for jobs traditionally held by women and minorities are low. The supply and demand structure of these jobs dictates that pay rates will likely remain low, despite the assessed relative value of these positions in the organization. Employers should, however, recognize that they may be open to complaint as a result of recent human rights legislation on the basic requirement of equal pay for work of equal or similar value.

Entry-level salary and promotion within pay ranges are areas of potential bias because they involve subjective judgment. Entry-level salary may be a matter of negotiation between the employee and employer, with bargaining to determine at what level of the pay range a new employee will start. Employers often justify paying men higher starting salaries than women, even when their responsibilities are the same, because men had higher earnings in previous jobs. Such practices are discriminatory and make the employer vulnerable to legal action.

Progression within the pay range may be automatic, based on seniority, or tied to a performance evaluation or merit pay system. In the last case, there is potential for bias and care must be exercised in its application.

2. Benefits

Legal requirements for benefit packages involving health insurance, retirement pensions, or maternity leave differ among jurisdictions in Canada. Some of the areas of possible differential treatment under benefits provisions are discussed below.

Pre-Existing Conditions. Health insurance, income replacement plans, and other insurance plans may have "pre-existing conditions" clauses that limit an employee's coverage related to a health condition that existed prior to joining the plan. These clauses will have an adverse effect on disabled persons. Under the Canadian Human Rights Act, pre-existing-condition clauses are limited to conditions that have been treated within one year prior to the employee's becoming insured under the plan. Employers with fewer than 25 employees are exempt from these clauses.

Pregnancy. A growing number of pregnant women are choosing to take short-term maternity leave. The right to temporary leave of absence without jeopardizing career advancement is of serious concern to women. A growing number of short-term disability plans and union agreements are providing maternity benefits even if there is no legal requirement to do so.

Pensions: Pension plans may provide lower monthly benefits for women or may require larger contributions from women in order to receive equal benefits. The traditional rationale is that women live longer than men and will therefore collect benefits for a longer time. Legal requirements vary from province to province with respect to pension benefits based on factors such as sex, marital status, and decendants.

The regulations of the Canadian Human Rights Act do not allow sex-based differences in benefits administered by the federally regulated sector. An exception is provided for voluntary plans. In the case of provincially regulated companies, it is advisable to seek the advice of the provincial human rights commission.

G. Working Conditions

Working conditions normally refer to such things as hours of work, attendance reporting, access to facilities and services and dress and grooming codes. As with the question of benefits, the provisions that are not made may be as important as those that are. Good working conditions foster a good working atmosphere.

It is important for organizations to ensure that the working conditions that are established are job related and consistently applied across all levels. It is also critical that organizations deal with personnel issues that relate to the internal working atmosphere. Failure to do so results in an inappropriate use of human resources and increases the risk of human rights complaints.

1. Working Atmosphere

In terms of affirmative action analysis, the working atmosphere in an organization is defined by the degree to which the environment is receptive to members of the designated groups in all positions.

Many working women, and some men, are victims of sexual harassment. In many cases, sexual harassment is difficult to detect because victims are hesitant to lodge a formal complaint. One indication may be the high turnover of female employees in a particular unit.

Sexual harassment may be defined as any sexually related act, practice, comment, or suggestion that injures, humiliates, insults or intimidates an employee; constitutes an invasion of personal privacy; undermines job performance; or threatens economic livelihood. Most employers deal with such incidents on a case-by-case basis. This often leaves the victims of harassment unsure of their rights or uncertain of the outcome of a complaint. It also does nothing to prevent these incidents from arising again.

Women working in various non-traditional jobs, or competing with men in areas where women have traditionally been under-represented, may experience a general lack of acceptance and support from colleagues. harassment may be overt, as when derogatory remarks are made or a supervisor refuses to give women certain assignments; or covert, as when women are left out of meetings, not sent on out-of-town trips, or bypassed in information systems.

Native employees may encounter similar harassment at work in the form of derogatory comments, isolation or differential treatment. In the same manner, disabled employees are denied opportunities due to misinformation concerning their disabilities.

Failure to provide a hospitable working atmosphere for members of the designated groups results not only in the unfair treatment of the individuals involved, but also in the ineffective use of human resources.

2. Non-Job-Related Duties

Another way in which job assignments reflect stereotyping is in the assignment of non-job-related duties. Support staff are often assigned non-job-related duties such as shopping or arranging personal appointments or holidays for their supervisor. Relegating these kinds of duties to certain employees promotes an image of their office role as an extention of their traditional social role. It also infringes on the time they can devote to job-related duties, resulting in inefficient use of the organization's resources. These practices may also influence opportunities for advancement in the organization.

3. Physical Access

Limited physical access to working premises may restrict the participation of disabled workers. Inadequate transportation or parking provisions may even prevent access to the worksite.

4. Availability of Alternative Work Arrangements

Inflexible work arrangements may have an adverse impact on some members of the designated groups. In some instances, full-time work may be beyond the physical capacity of some disabled workers or interfere with family responsibilities of some women. Flexible arrangements for job-sharing or part-time work may be advantageous for both workers and employers in these instances.

It may be noted in this connection that the family responsibilities of raising children need not be entrusted only to women. Granting leave to either parent for attending to family responsibilities would permit many women to participate more fully in the labour market.

5. Dress and Grooming Codes
While organizations may have many legitimate concerns about the image their employees present, only job-related requirements should be imposed. Employers have legitimate concerns in certain jobs and situations — for example, where an employee represents the company, or when a certain image is desired — but dress criteria should be job-related and consistent.

6. Disciplinary Action
Rules and procedures in organizations should dictate acceptable standards of work behaviour for safety and efficiency. These rules may be presented in detailed written documents or in verbal instructions open to constant modification. Areas covered will often include safety requirements, definitions of insubordination, hours of work, reporting time, behaviour on the job, dress and personal grooming and a definition of satisfatory work. In many jobs or professions there are also unstated "rules" regarding political affiliation or social conduct. Disciplinary action for violation of rules may range in severity from informal warnings to discharge.

Perhaps the most common discriminatory practice is to apply standards inconsistently. This may result when disciplinary procedures permit a substantial degree of discretion by the manager/supervisor. Although flexibility is required in individual situations, it is essential that procedures be consistent.

7. Resignations
Members of the designated groups may be over-represented among employees who voluntarily resign. Reasons for higher turnover among these workers may include the discriminatory practices already discussed. Two of these deserve special attention.

Concentration and under-utilization. The low pay and low status of jobs in which many women and minorities are concentrated destroys incentive to remain there, particularly if working conditions are also unpleasant. Discrimination in pay and benefits may contribute further to lower morale and higher turnover.

Harassment. Management in organizations may ignore or tolerate harassment of women or minorities on the job. If the individuals being harassed feel that supervisors and co-workers tolerate this behaviour, they may leave their jobs. This can result in high turnover for the organization involved.

H. Terminations and Layoffs
When a firm has to cut back its workforce, seniority and performance appraisal are generally used as guidelines in determining layoffs. Both of these criteria may result in adverse impact on target group employees. Terminations stemming from changing skill needs can also have adverse impact on members of the designated groups concentrated in jobs affected by these changes.

Seniority. Terminations and layoffs tend to affect members of the designated groups because of their recent entry into the workforce. This negative impact is accentuated when seniority is narrowly defined, that is, by department or job group rather than company wide.

Performance Standards. Using performance appraisals is one alternative to a seniority-based system. Performance appraisals, however, are open to all the problems associated with subjective evaluation criteria and attitude bias on the part of the evaluator.

Change in Needed Skills. Technological changes may affect the skill needs of an organization. Women, native people and disabled persons are often concentrated in jobs most likely to be eliminated by technological change. For example, new office technology may reduce an organization's requirement for typists and clerks but increase its need for administrators and technically trained operators. Some employees will be retrained while others will be terminated. The criteria used to select those to be retained must meet the tests of objectivity and validity.

Alternatives to Termination. Employers may develop alternatives to termination. It is necessary to determine the impact of these alternatives and to ensure that policies are applied equally. For example, policies developed to allow employees to transfer to other positions as an alternative to layoff or termination can be discriminatory in nature. If eligibility relates to seniority, is restricted to occupations or units that effectively exclude members of the designated groups, or is influenced by subjective or biased opinions, adverse impact may result.

Exerpted from "Equity in the Labour Market: The Potential of Affirmative Action, Appendix 1, Employment Systems," by D. Rhys Philips, in **Equality in Employment Research Studies**, pp. 102-107. Judge Rosalie Abella, Commissioner. Ottawa: Canadian Government Publishing Centre, 1985.

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Resources

Ontario Women's Directorate Consultative Services Branch

The Ontario Women's Directorate is the agency in the Ontario government that co-ordinates the development and communication of programs and policies for women. Its aim is economic and social equality for women in Ontario.

The Consultative Services Branch of the directorate specializes in the area of employment equity. It is responsible for encouraging the planning, development and expansion of employment equity programs in Ontario's public and private sectors.

In order to achieve this goal, the branch provides a wide range of consulting services to employers who are either just beginning to initiate employment equity programs, or who wish to enlarge those already established. Consultants offer employment equity strategies that are tailored to the organization's particular environment.

The services that this branch offers include:

- Workshops and seminars
- Technical guides and information
- Videos
- Advice on relevant legislation and government policies
- Opportunities to exchange ideas with other employers through networks and demonstration projects
- Recognition of success through annual awards in employer excellence

For further information, contact:

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Ontario Women's Directorate

Honourable Ian Scott
Attorney General and
Minister Responsible
for Women's Issues

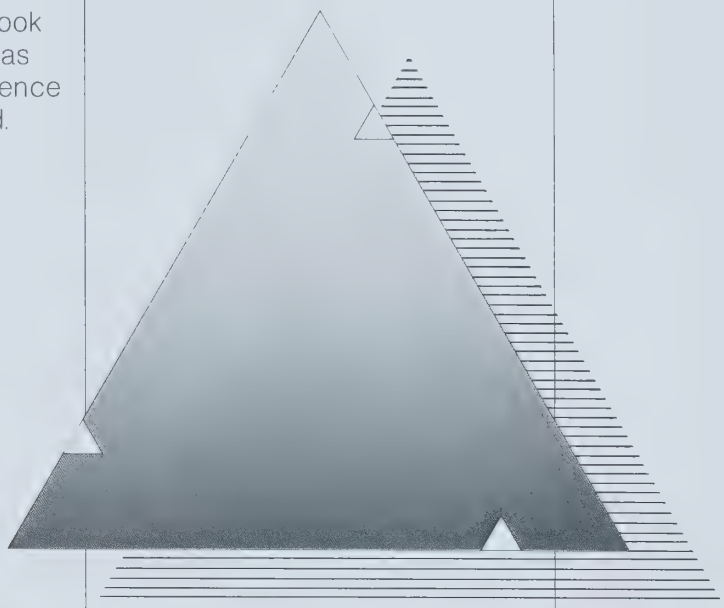
ISBN 0-7729-2469-4

Managing Employment Equity

initiatives

Ontario Women's Directorate

This booklet is one of a series of publications on employment equity produced by the Ontario Women's Directorate. The first booklet introduces the series. The second booklet gives an overview of the employment equity management process. The third and fourth booklets, **Organizational Analysis** and **Organizational Change and Impact**, examine the process in more detail. **Legislation — A Guide for Employers**, the fifth booklet, provides background on employment and equity legislation for Ontario employers. Here we look at practical examples and ideas from organizations with experience in the employment equity field.



Organizational Analysis

The first step in the employment equity management process is organizational analysis — a review of the workplace and the people in it.

Organizational analysis is the foundation stone of the process, for it allows employers to gather all of the pertinent information they will need for the changes that lie ahead.

Organizational Change

The employment equity program — just like any program that results in significant change within an organization — must be handled with care and sensitivity.

It therefore requires careful planning and implementation if it is to be effective, if it is to be successful, and if it is to have a positive impact.

Organizational Impact

All good managers want to be able to assess the impact of change on their organizations.

They must consequently monitor the employment equity process as it moves through each step towards its ultimate goal — a workplace in which people are hired, trained, promoted and paid on the basis of merit alone.

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Introduction

This booklet is the sixth in a series of publications on employment equity. The series guides employers through the development and implementation of an employment equity policy that fits their organizations' culture and needs.

The organizations highlighted in this booklet provide a sample of employment equity programs. There are, undoubtedly, a number of other employers in the province who are also taking innovative action on this issue.

The programs described in the pages that follow are wide-ranging in nature. Topics include:

- How one organization got started in employment equity.
- How another employer handles management training.
- How unions are involved in employment equity initiatives.
- How an Ontario university faced the problem of sexual harassment and took steps to eliminate it.
- How an aircraft plant with a heavy concentration of male employees took a new direction and introduced women into non-traditional jobs.

New directions are often the trademarks of effective employment equity programs. It is through new attitudes, new approaches and new policies that change is shaped in an organization. When employers and employees are willing to take a fresh look at the workplace and challenge traditions that have lost their meaning, then organizations make real progress. They can set to work with programs that respond to the modern workforce and reflect its energy and potential for growth. In return, employers are rewarded with increases in employee motivation and productivity.

The experiences of the organizations included here testify to the value of such creative initiatives. They have made a commitment to employment equity by addressing it on several fronts.

While they recognize the need to remove sexual discrimination from their current policies and practices, they don't stop there. These organizations are also providing remedies for past discrimination that has impeded women in their careers. Special measures such as training programs and accelerated employment equity goals are encouraging female staff to participate fully in the workforce.

Putting principles into practice presents the workplace with a distinct challenge. The examples that follow illustrate how the challenge has been met — with imagination, with ingenuity and often, surprisingly, with considerable speed.

This publication begins with a focus on successful employment equity programs. From this overview, the employer is then provided with descriptions of innovative initiatives that Ontario employers have implemented. Initiatives range from increasing the number of women in non-traditional work to personal safety programs. This booklet also discusses the importance of open employer/employee relations in employment equity and provides examples of individual employment equity measures employers have found to be successful. The final section provides information on two programs offered by the Ontario Women's Directorate to assist employers interested in employment equity.

'Establishing equal opportunity in the workplace is not just a well-meaning philosophy, but a sound economic direction. By developing a dedicated, enthusiastic workforce, employers can enhance their current performance and make an important investment for the future. It is a vital step towards the excellence that is the cornerstone of a successful and dynamic organization.'

Ian Scott
Attorney General and Minister Responsible for Women's Issues

Three Employment Equity Programs

Employment Equity at London Life

"We in the private sector should act and not wait for employment equity legislation. We have to move ahead," says Earl Orser, president and chief executive officer of London Life Insurance Company — and move ahead they have.

In 1981, London Life began to examine the status of women in its workforce. A workforce analysis found that although 42 per cent of employees were women, they were distributed unevenly throughout the organization: 74 per cent of the administrative staff were women, but females made up only 7.2 per cent of the sales staff and two per cent of management positions.

A task force was established to develop an employment equity policy and an employee survey found that there was support for such a policy within the corporate environment. This support is reflected in London Life's "corporate mission statement," which says in part: "We will treat employees equitably by hiring and promoting them on the basis of their individual skills."

The company then set a corporate goal to increase the number of women in sales and management. The strategy adopted included a number of specific initiatives that have been modified and expanded over the years.

London Life developed an internal data base to measure progress and, more recently, to set goals and targets. In 1983, with the introduction of its Women in Management program, the company set a goal of increasing the number of women in this area from two per cent to 10 per cent in five years. The company has met this goal one year ahead of schedule. Women have been appointed to positions previously held almost exclusively by men.

The company met its goal by developing existing talent within the organization and by outside hiring. In addition, a recent policy requires that at least one of three final candidates considered for a management position should be a woman. Managers are responsible for this policy, which not only ensures that qualified women will be considered for all management positions, but also brings potential women candidates to the attention of more senior managers.

London Life also set out to identify the training needs of women. Working with education and development staff, the company continues to target special programs to assist staff in advancing their careers. Resume-writing workshops, assertiveness training, "lunch and learn" sessions for dual-career families and supervisory training are some of the in-house programs that are giving women the skills they will need to move into management.

Technical and supervisory levels provide the company with a base from which to select management candidates. Since 1982, the number of women in these positions has increased to 55 per cent from 47 per cent. In addition, the human resources department maintains and upgrades an inventory of all staff skills. This special data bank is used in part to track high-potential women — to bring them to the attention of management and, where possible, to place them in positions that will allow them to develop their potential.

A revision of recruitment practices has also been a focus of London Life's employment equity strategy. The company reviewed its employment application and job posting procedures to eliminate systemic discrimination. They continue to monitor these systems to ensure equitable treatment.

Recruitment was of particular concern when the company looked at its sales force. In 1982, only 7.2 per cent of its 2,600 sales representatives were women. A special recruitment campaign was introduced to increase the number of women sales representatives and the campaign has paid off. In 1986, 13.7 per cent of the sales staff were women. The company plans to see more progress in this area, especially in moving women into field management positions. A special task force has been set up to recommend ways to deal with this issue.

Corporate awareness was another priority for the company. In 1982 it introduced a sexual harassment policy; and the corporate communications strategy calls for the continuing promotion of female role models, so that other women in the workforce will be encouraged to develop their skills.

As part of its employment equity approach, London Life has been a leader in developing innovative benefits and working arrangements for both male and female employees. Job-sharing, full staff benefits to part-time employees and flexible working hours are methods the company has chosen to attract and keep good people. For Mr. Orser, commitment is an important part of London Life's success: "What you need is top management support," he says. "In order to communicate to everyone that these policies must be followed for the benefit of the company, people have to see it in day-to-day practice."

Changes at Consumers' Gas

Although the Consumers' Gas Company Ltd. has only had a formal employment equity program since 1984, its integrated approach has had significant impact. "Employment equity is more than just a program, it is part of the way that we do business," says president Robert Martin.

The Consumers' Gas experience illustrates how quickly an employment equity program can make improvements in the workplace. Consumers' Gas employs 3,210 people — almost 1,000 in field positions. Field workers include pipe fitters and meter readers and traditionally have not been women. In fact, the gas industry in general has not attracted large numbers of women into field operating areas, primarily due to the physically demanding nature of the construction and service work and the engineering requirements of management positions. It looks as though this may be changing, however, at Consumers' Gas.

In the last two years, the representation of women in field positions has doubled. In addition, women filled three of the company's five engineering graduate positions. At the senior management level, three openings in financial and legal positions were filled by women. Along with these changes in the occupational distribution of women in the company, Consumers' Gas has also introduced a number of innovative benefits and working arrangements that will affect women's participation in this particular workforce. The company has a benefits program for part-time employees working 14 hours per week; it has a child-care advisory service; a job-sharing pilot project; and a six-month maternity leave program. It has also established a specialized salary and benefit plan for women returning to work on a part-time basis after maternity leave.

The first year of the Consumers' Gas employment equity program was devoted to assessing the issues, analyzing the company's environment and designing an employment equity approach. The

company then developed an employment equity policy that focused on the fuller integration of women into the workforce. It also established a management review group to monitor the employment equity process. The following year, activities and programs were introduced to address the equity issues identified in the previous year.

A workforce analysis and a review of Consumers' Gas' employment systems laid the foundation for special measures designed to open up opportunities for women workers. The company holds noon-hour sessions on non-traditional jobs, for example, and potential positions are highlighted in the company newsletter. An analysis of the physical demands of all field positions has just been completed and a test is now available to allow women employees to assess their physical capabilities.

The company has also entered into a *Change Agent* project with the Ontario Women's Directorate. Through the project Consumers' Gas is developing a joint union/management problem-solving approach aimed at increasing the number of women employed in non-traditional jobs.

Workshops on career planning, parenting and male/female interaction have been devised, along with a series of administrative workshops. Management training has also been offered. A kit for management staff outlines the current legislative climate and the Consumers' Gas employment equity approach, plans and initiatives. The company has added employment equity to its orientation and supervision courses and the firm's hiring and promotion system highlights employment equity.

For its annual succession planning meetings, the company has developed an inventory of high-potential women. It has also introduced a clerical job evaluation system that is free of gender bias.

Consumers' Gas plans to follow up its employment equity program by monitoring equity plans, undertaking a more detailed workforce analysis and assessing pay equity issues. At the same time, the company will continue to integrate employment equity initiatives into its planning and accountability cycle. Consumers' Gas is fully committed to the program — and pleased with the results it has achieved so far.

Toronto Hydro

Toronto Hydro made a public commitment to equal opportunity in 1984 and then started to develop and implement a number of effective and innovative measures.

- An electrical theory course was offered in house during working hours, to accommodate working mothers who find it difficult to attend evening courses. This course also focused on encouraging women to enter non-traditional fields.
- As a direct result of a lunch-time seminar presented by a female tradesperson to clerical staff, 12 women moved from that area into non-traditional positions in both the trade and technical areas.
- A vigorous outreach program recruits women for non-traditional positions at Toronto Hydro. The organization contacts community colleges, women's retraining centres and women's networking groups, and qualified women are referred to Toronto Hydro.

Positive steps were also taken in the organization's benefits. Part-time employees are eligible for company-paid benefits. A "top up" payment supplements unemployment insurance maternity benefits for both unionized and

Special Initiatives of Ontario Companies

non-unionized women. All employees have access to an in-house, child-care consultant during working hours.

As the foundation for its strong equal opportunity program for women, Toronto Hydro conducted both a workforce analysis and an analysis of the recruitment and promotion system.

Women and Non-Traditional Work

Moving women into jobs that have been traditionally filled by men is one of the greatest challenges of employment equity. It is also one of the most exciting aspects of the program. Non-traditional areas of work offer women greater earning potential and the opportunity to broaden their skills and enhance their marketability in the workforce.

What is being done to meet this challenge? Governments are playing a leading role by offering training and job creation programs that are specifically aimed at channelling women into non-traditional areas of work. In addition, governments provide employers with incentives to hire women.

At the community level, organizations like Toronto's Women In Trades are providing women with the basic training and support they need to make this occupational transition. Employers, both private and public sector, are also responding. In the last six years or so, the number of training programs and job opportunities for women in non-traditional occupations have increased significantly. Ontario Hydro, the Toronto Transit Commission, the Toronto Police Commission, Consumers' Gas, Toronto Hydro and General Motors are among employers who have recognized the need for special initiatives to improve the representation of women in non-traditional occupations.

The de Havilland Aircraft Company of Canada Ltd. has made significant strides in this area. Its experience is notable because this company has been innovative and flexible in its approach, and most importantly, they have had results.

De Havilland employs 4,900 people, 3,100 of whom are in production. Like all jobs in the aerospace industry, specific technical skills and training are required for entry level positions. At de Havilland, all plant workers start as bench and structural assemblers. Few women were placed in these jobs, however, and de Havilland wanted to improve this situation.

Although the company does not have a formal employment equity program, their creative recruitment and training initiatives have achieved the following results:

- In 1982, out of 100 people working in bench and structural assembly, only two were women.
- By 1985, 135 of 600 new staff in non-traditional positions were women.
- In 1986, 68 of 400 new positions were filled by women.
- Three women are production supervisors.
- In lofting (a drafting specialization), nine of the 30 employees are women.
- Women have moved into airframe assembly, the wood shop and the machine shop — and one woman is a tool and die apprentice.

How did they do it? De Havilland has a two-week basic training program for all new employees. When the company began hiring women, it set a goal to have a 50/50 split of men and women in each group of new trainees. Many entry level women, however, had less technical preparation for the

jobs than men and thus required more training. So that the women would not be isolated, de Havilland took three innovative steps.

First, they reduced the number of new trainees women to 25 per cent, to promote easier integration. Then they contacted community colleges and set up job-entry preparation programs so that once women began to work they would not need extra help. Finally, they recruited from community programs that train women for non-traditional work. These included: Introduction to Non-Traditional Occupations (INTO), offered by the community colleges; Women Into Trades and Technology (WITT); and a special program — West End Machining — which provides women with a year of basic machinist's training.

The result of de Havilland's efforts was that rather than hiring "off the street," the company has been able to find experienced, competent and well-prepared women workers. This has benefited both women and the company.

Flexible Benefits and Working Arrangements

Increasingly, organizations are recognizing the importance of benefits and working arrangements in attracting and keeping talented, competent employees. As society changes, as single-parent households increase and two-parent working families try to combine work and family responsibilities, employers will have to adapt their environments to meet their employees' needs. Special measures such as flexible time, flexible benefit packages, maternity and adoption leave policies, job-sharing, relocation policies for dual-career families and child-care options are gaining popularity in many firms. A number of private and public sector organizations, for example, have developed a variety of child-care programs. At Manufacturers Life Insurance Company, day care is available to employees' children at a neighbourhood centre. The company supports the centre financially in return for a guaranteed number of spaces for the children of employees. In addition, a maternity leave counselling service offers information on other kinds of child-care arrangements.

Ontario Hydro established its own on-site centre — *Hydro Kids* — and opened for business in 1985. By April 1986, 54 children were registered. The company contributed $200,000 to renovate the facilities. It provides the space rent-free and pays for utility costs.

At Toronto Hydro, the issue of child care is addressed in a variety of ways. In co-operation with the union local, the company has just circulated a survey to employees in order to gauge future child-care needs. The results of this survey are now being compiled and will soon be published. At the same time, Hydro has purchased *The Working Parents Day-Care Assurance Plan* from Toronto's Family Day Care Services. This plan provides employees with access to a child-care consultant at the Hydro facility during the day. The consultant offers an information and referral service.

Flexibility in the traditional nine-to-five workday recognizes schedule conflicts that affect both men and women. Family responsibilities for children or older family members; educational pursuits; or the need to attend medical appointments can put strains on an employee who is confined to a rigid workday. Employers have found that flexibility can increase productivity by allowing employees to be fully committed to the job at hand.

At General Motors of Canada Limited, a *Flexible Service* program provides permanent part-time opportunities for both current employees and new applicants.

The program permits employees to work a minimum of 20 hours per week, up to a maximum of 32 hours per week.

At London Life Insurance Company, part-time work is available to all employees without loss of benefits. In addition, the company offers a job-sharing program to men and women in an effort to retain its skilled people. Currently, 46 employees are taking advantage of this benefit.

The Manufacturers Life Insurance Company provides complete company benefits to part-time staff working more than 30 hours per week, while those part-timers working 20 to 30 hours per week are entitled to personal company benefits. Consumers' Gas has introduced a benefits program for part-time employees working 14 hours per week.

Ortho Pharmaceutical (Canada) Ltd. offers pro-rated benefits to all permanent part-time staff working a minimum of 20 hours per week. As well, this company offers part-time work assignments to female employees who have left the company to raise families.

Maternity leave is another area that is changing rapidly. The University of Western Ontario, for example, provides 17 weeks of paid maternity leave amounting to 95 per cent of an employee's salary. An optional 35-week unpaid leave is also available.

At General Motors, salaried employees on maternity leave receive supplements amounting to 75 per cent of their regular earnings, while unionized employees receive supplements equivalent to their sickness and accident benefits. London Life supplements maternity benefits for employees earning more than $25,000 (approximately 18.5 per cent of their workforce), increasing their total to 60 per cent of their regular income.

In recognition of dual-career families, General Motors has a relocation policy which allows a spouse up to $1,000 as a job search allowance.

University Hospital, in London, has broken new ground by offering a job-sharing program. Introduced in 1979, the job-sharing option has been taken up by 180 staff members throughout the hospital at all staff levels. The hospital complements its job-sharing program by offering a full benefits package to all job-sharing and part-time staff who work a minimum of 22-and-a-half hours per week. For this hospital, job sharing allows staff to further their educational and career goals, fulfill family commitments and yet remain integral members of the hospital community. Job sharing and other progressive employment practices contribute to the overall excellence of the hospital's medical program.

Organizations like these are showing real creativity in their responses to the modern needs of their employees. Employers' solutions to the demands of family life are helping to make today's working environment both more flexible and more humane.

'I am now entering my third year of both job sharing and university and feel I have the best of both worlds. My job has allowed me to contribute to the family income and at the same time allowed me to attend the daytime courses necessary to complete my degree.'

Pat Smith
Secretary, Otologic Function Department
University Hospital, London

Eliminating Sexual Harassment

The University of Western Ontario has demonstrated leadership in firmly addressing the sensitive area of sexual harassment.

As a result of a 1983 report, written by a cross-section of employee groups, the university has adopted a comprehensive policy on sexual harassment that applies to all groups on campus — faculty, staff and students. The policy details both informal and formal mediation processes, with procedures and the roles of the various parties clearly defined. (See Appendix for sample policy and complaint procedure.)

In accordance with this policy, the university has also appointed two sexual harassment advisors, one of each sex. It is their role to: inform the university community about sexual harassment in general and Western's policy in particular; provide advice and/or information to both parties involved in a sexual harassment allegation; and facilitate the adjudication process in specific cases.

The university's commitment to the reduction of sexual harassment is apparent in the vigorous and far-reaching awareness program run by the sexual harassment advisors. In addition to conducting on-campus workshops, they have produced and distributed written material on the subject for all members of the community. Of special note is Western's participation in the production of the acclaimed video, *Breaking the Trust: Sexual Harassment on Campus*. The awareness program focuses solely on sexual harassment at university, college and high-school campuses, and is being positively received across Canada.

By making people aware of the issue and by providing an avenue for complaints, the university hopes to reduce the incidence of sexual harassment. Its straightforward approach has resulted in an increase in the number of reported complaints, as victims of sexual harassment are assured that they will be treated seriously and with dignity.

Du Pont Canada Inc.'s Personal Safety Program

At Du Pont Canada Inc., the topic of rape is not ignored in the hope that it doesn't exist. The company has recognized its role in dealing with an issue that affects everyone and has developed a personal safety program to address it.

The program was started as a result of the increase in the number of women working in non-traditional jobs. Women make up a growing number of Du Pont's workforce in Canada and even with the company's clear sexual harassment policies and travel safety guide-lines, it was felt enough wasn't being done.

The personal safety training program consists of an eight-hour rape prevention workshop for women and a half-day managers' workshop — all run by employee facilitators. Like all the other Du Pont employee training programs, it takes place on company time.

Du Pont's corporate guidelines for victims of rape outline the options available to the employee — who may report the incident to any supervisory or management person with whom they feel comfortable. This reporting policy has also had an effect on the company's sexual harassment policy.

An employee can now report a sexual harassment problem to any Dupont supervisor, a change from the company's usual line-management-oriented policy.

The guidelines also state the manager's responsibilities — and such things as the confidentiality and sensitivity required in these circumstances. The company also offers support by providing the following benefits for the victim:

- time off with pay for periods of physical or mental disability for up to six months — in accordance with Du Pont's disability pay benefits;
- the majority of the medical and psychological care costs for assault cases (covered by Du Pont's health plan). All costs are covered if an assault should occur in the course of employment at Du Pont;
- the company's legal unit is available for general legal advice.

The personal safety program was initiated by Du Pont's American parent company in January 1986 after two years of development and a cost of $500,000. It came to Canada later the same year.

"The program is a natural extension of Du Pont's commitment to employee safety which we know has a direct link to business and productivity," says Bill Leet, Personnel Manager at Du Pont Canada Inc.

Du Pont advises that other companies could start similar programs without the expense. The simplest way to get started is to get the corporation to acknowledge that personal safety risks do happen, and to start conversations about it.

Some comments from program participants:

"It was so beneficial to have (the term) "rape" taken out of the closet and learn what it is really all about."

"It exceeded all my expectations and it is probably the most informative and valuable one-day seminar I have ever attended."

"Now I hope I would know what to do should it happen to me, and I also feel confident to be able to understand someone else if it happens to them."

Working with Employers

The Employee Attitude Survey

Employee attitude surveys generally have the following objectives:

- To determine how employees rate the organization as an employment equity employer
- To obtain information about real or perceived discrimination in the company
- To gauge employee response to implementation of an employment equity program
- To record specific issues that may impede further action on the subject of employment equity
- To encourage comments relating to employment equity

Ensure that this information is treated confidentially. Many employees may be reluctant to share their feelings in response to the questions.

The following questions may suggest ideas for interviews or questionnaires:

1. Do you see the company as an employment equity employer now?
2. Should the company be considering employment equity at this time?
3. What change do you want to see in the company as a result of addressing employment equity?
4. Is there discrimination in this company? What form does it take?
5. How should the company proceed to address employment equity (e.g. pace, employee involvement)?
6. What obstacles do you see in the company that may impede employment equity?
7. What support do you see in the company that may assist employment equity?
8. Are women represented adequately in company management?
9. Are women represented adequately in professional positions and in occupations traditionally dominated by men?
10. Do you think that men in the company would accept working for a female manager or supervisor?
11. Do women have to be different or better than men to be seen as strong performers?
12. Are there traits in women that make them more or less effective than men as supervisors or managers?
13. Will there be opportunities for women in the future due to growth, promotions or retirements?
14. What are some of the solutions that you think might be considered in dealing with employment equity in the short, medium and long terms?
15. Where should the accountability for employment equity rest in the organization?
16. Should there be formal incentives or disincentives to recognize results which have been achieved?
17. Is employment equity a business issue, or is it a social issue?
18. How do you think people in the company will perceive employment equity?
19. Given the business demands of the organization, where does employment equity fit as a priority?
20. Are there any other points you wish to raise about employment equity?

Joint Ventures — Union and Management

Some organizations tackle employment equity issues within the framework of unionized environments — jointly initiating projects and activities that address the issue in practical terms. Unions' roles have ranged from involvement in implementation to employment equity plan development.

At Ontario Hydro, the Corporate Affirmative Action Committee, which is responsible for designing and monitoring their affirmative action program, is chaired by the program's manager. It includes representatives from each of the organization's nine branches, as well as a representative from the Society of Ontario Hydro Professional and Administrative Employees and a representative from CUPE Local 1000. Union and management rewrote the collective agreement with CUPE Local 1000 in language that is free of gender bias.

Consumers' Gas, employing 3,210 people with approximately 1,000 in bargaining unit field positions, has recently entered into a *Change Agent* project with the Ontario Women's Directorate. The objective of the project is to develop a joint union/management problem-solving process aimed at opening up more field opportunities to its office workers. The company, in consultation with the union, has also just completed an analysis of the physical demands in all its field jobs, in order for women to be able to assess their physical capabilities.

Joint union/management employment equity issues — particularly benefits and working arrangements — are often highlighted in collective agreements. The township of Markham and its CUPE locals, for example, have developed progressive special measures and benefits and working arrangements for female employees. The corporation provides paid leaves of absence in two local CUPE collective agreements to allow employees to cope with sudden illnesses of spouses or children. In the collective agreement between the corporation and CUPE Local 1219 (outside workers), the maternity leave policy ensures that all of the employee's benefits are maintained by the employer during the period of leave. The corporation believes that this measure will encourage women to apply for positions that traditionally have been male occupied.

In some cases, unions have led the way in negotiating special measures for female employees. At the Young Women's Christian Association (YWCA) in Toronto, for example, CUPE Local 2189 negotiated a six-month unpaid maternity leave, as well as a monthly $30 dollar payment towards child-care costs for women with children under the age of 11.

For those private and public sector organizations with unionized settings, devising employment equity strategies like these, which include a role for the union, will go a long way towards ensuring program success.

Keys to Success

Communicating the Message

Effecting positive change in an organization is a far-reaching initiative, and one in which all employees can assist.

Ontario Hydro has recognized that in an organization of over 23,000 employees, getting information distributed can be a challenge as well as a vital element of a successful program.

Hydro uses a wide variety of vehicles — some established, some new — to help each employee understand the program and its goals and to recognize the changes in the corporate culture as they occur.

For wide-spread distribution of information, Hydro had several methods of informing employees. These included: general announcements on bulletin boards; the daily Hydro telephone newscast; and the employee newspaper *Hydroscope*. These are now used regularly to feature affirmative action issues. Articles appearing in *Hydroscope*, for example, have profiled women working in Hydro's Law Division and nuclear stations, as well as Ontario Hydro's first affirmative action conference.

It was recognized, however, that individual employees could have questions and concerns about the program that would require closer contact and more immediate communication of the program and its goals. As a result, several initiatives were undertaken to ensure that information is also provided from the bottom up as well as the top down.

Staff of the Affirmative Action Program Department perform a counselling role for individual employees on a variety of career-related issues, as well as acting as an information "hotline" for anyone with questions on affirmative action. Presentations on affirmative action are made on request to groups throughout the corporation who have questions about the program and any of its initiatives.

The Affirmative Action Program Department publishes *Affirmative Action Update* at regular intervals throughout the year, to keep employees informed of changes in benefits, courses, products and Affirmative Action initiatives of interest. Over the past 12 issues of *Affirmative Action Update* the distribution list has grown from 20 employees to over 3,000. In addition, several branches have begun to produce their own newsletters, presenting information on affirmative action on a local level.

Recognizing that affirmative action will bring about changes in roles and values in society as a whole, the Affirmative Action Program Department presents varied external speakers over the noon-hour on such topics as pay equity, the dual career family, women in non-traditional jobs, working mothers, and women and power — to name a few. These presentations are videotaped for viewing at Hydro's more distant locations and for home viewing by spouses and families.

Ontario Hydro feels that supervisors are a vital link in successful implementation of its affirmative Action initiatives. Because of this, several products have been developed with them in mind. One such product is *F.Y.I.— Orientation Information That Makes a Difference*. This package provides information to supervisors and their female trades staff on sexual harassment, affirmative action contacts and other topics of interest to new tradeswomen. Other publications include a comparison of men and women in the areas of promotion, pay treatment, and a handy one-page ready reference of all corporate affirmative action initiatives. Reports and summaries of task force presentations are

advertised to employees and made available on request.

The Affirmative Action Program Department maintains an extensive library of articles and books on subjects relating to affirmative action, to which every employee has access. In addition, various branches have developed their own specific library resources.

To keep senior managers up to date and fully informed, the Affirmative Action Program Department distributes topical articles and information about women in the workplace directly to senior management.

In addition, both the President, Robert Franklin, and the Chairman, Tom Campbell, have been consistent and clear in their messages of support for the affirmative action program and often include statements in this regard in their speeches and statements.

Affirmative action calls for many changes in policies, programs and actions. It is important that these changes are communicated thoroughly and regularly to employees and that any questions regarding the changes can be quickly answered.

'What we're engaged in is a change in societal values and a change in the culture of the corporation. And you don't change values in a society and you don't change the culture in a corporation overnight.'

Robert C. Franklin
President, Ontario Hydro

Employment Equity Training for Managers

Managers play a key role in any employment equity program. They are often involved in setting employment equity goals and objectives; they are usually involved in program implementation; and they are almost always held accountable for program success.

Most employment equity programs include a training component. The training may include management training for women; awareness workshops for all employees; or programs for women breaking into non-traditional work. In addition, however, a number of organizations have developed training modules aimed specifically at managers, to ensure that they are familiar with employment equity issues, concerns and strategies.

The companies below created the following approaches:

The Consumers' Gas Company Ltd.

- An employment equity kit, outlining the legislative climate and the company's position
- Supervision courses, including an employment equity component

George Brown College

- Affirmative action seminars for senior managers

The Manufacturers Life Insurance Company

- Human rights legislation and employment equity workshops

Municipality of Metropolitan Toronto

- The municipality has developed a unique management training program. Through role-playing, a three-day residential workshop teaches middle and senior managers to develop sensitivity and experience in order to deal effectively with multicultural and human rights issues

Westinghouse Canada Inc.

- Comprehensive awareness workshop on employment equity

Women in Management

For many organizations, the focus of employment equity is an increase in the number of women in management positions. The options for attaining this goal are many and varied. They can include:

- Searching out potential candidates
- Making sure jobs are posted
- Actively encouraging women to apply
- Identifying high potential women; assisting them in the development of career plans; and developing training and experience opportunities to help them attain their goals
- Identifying career paths to management; and ensuring that appropriately qualified women are represented

Sometimes a combination of approaches will get results. The Windsor Board of Education Affirmative Action Program, for example, provides opportunities for leadership training and skills development through courses such as *Preparation for Promotion*, *Selection Skills* and *Time Management*. In addition, a "job shadow-

ing" project was introduced in 1985. This project offered its participants first-hand experience and on-the-job training. Under the project, members of the teaching staff were paired with volunteer leaders — principals, vice-principals, department heads, and so on — for the equivalent of four full teaching days. Teachers accompanied senior level staff throughout their daily routines. Funded in part by the Ministry of Education, in co-operation with the Ontario Women's Directorate, the project was developed to complement the Windsor board's other employment equity initiatives.

The "shadows" reported that the project not only allowed them a close-up view of the leader's responsibilities, but also gave them a broader perspective of the educational system. The leaders also rated the project highly. It provided an opportunity, they said, to reflect upon their roles as decision-makers and to give them valuable feedback on their own job performances.

Accountability

Organizations — including Consumers' Gas — recognize the role of accountability in successful employment equity programs. At Consumers' Gas Company Ltd., employment equity initiatives are integrated into the company's business planning cycle and accountability mechanisms. Each of its 25 senior managers is responsible for ensuring that employment equity goals are being met.

One senior manager, for example, recently evaluated the ways the company could increase the number of women in field positions. He then negotiated an agreement between management and the union that would allow the two parties to formulate plans to further women's progress in the field.

Some managers have made employment equity an even higher priority by building it into their personal performance contracts. These managers are now evaluated on employment equity as they are on any other business objectives.

Robert C. Franklin, the president of Ontario Hydro, attributes the organization's success with employment equity to one factor — the responsibility for making affirmative action work rests with senior management. Performance contracts of senior managers at Ontario Hydro include progress in affirmative action. Each of the 15 senior managers has to establish annual targets. Their performance is measured and the results are publicized in newsletters, presentations and speeches.

Some organizations might elect to give special rewards to generate results in an organization's employment equity program. Managers could be offered management development opportunities, for example, in recognition of active contributions to the program's achievements. Merit certificates could be awarded to individual employers or divisions lending significant support. At one Toronto university, the president offered departments a bonus, to be used on department programs, if they increased the number of women hired. The following year, 40 per cent of those hired at the university were women.

'Basically, it's a matter of accountability. That's the core of success of any program, in any organization.'

Robert C. Franklin
President
Ontario Hydro

Monitoring Employment Equity

Monitoring the impact of an employment equity program is critical to its success. The vitality of the program depends on ongoing evaluation of its performance.

Ortho Pharmaceutical (Canada) Ltd. employs 260 people. In 1982, the company initiated annual affirmative action audits that are presented to its management board. The audits include: an evaluation of female representation by job category; salary administration practices; and personnel policies and procedures. Although Ortho does not have a formal employment equity program, the affirmative action audit has enabled the firm to set goals and objectives and re-evaluate strategies. The annual audit process also helps Ortho focus its priorities so that resources are productively allocated.

Since 1982, the company has made significant gains in female representation in supervisory, professional and managerial positions. Women have started to fill positions traditionally held by males, particularly in sales, and Ortho has also introduced innovative work arrangements and benefits. The company's monitoring system, as well as keeping track of specific employment equity initiatives, serves to make its commitment to employment equity more visible.

Other organizations have chosen slightly different systems for monitoring results. London Life, Consumers' Gas and Westinghouse integrate their employment equity monitoring systems into their annual business audits. The particular system chosen to measure the impact of the employment equity program will vary, depending on the organization's particular needs.

'If you make management responsible for employment equity, just as if they were handling occupational health and safety, merit increases, pay levels, or any other workplace issue, then they'll handle it.'

R.W. (Bob) Martin
President
The Consumers' Gas Company Ltd.

Co-operative Efforts — Government and Employers

The Government of Ontario, through the Ontario Women's Directorate, provides assistance to private and public sector employers establishing employment equity programs. Some of these co-operative efforts are described below. Further information on these programs and projects can be obtained from the Ontario Women's Directorate.

Private Sector Programs

The Change Agents Program was started in 1986 to enable the government and individual private sector companies and associations to work together to develop innovative employment equity projects or products. As part of the program, employers were required to share the results with other organizations. A total of five companies and two associations have participated in the program.

To date, these organizations and the Ontario Women's Directorate have produced eight projects — several of which have been in the area of non-traditional work for women. Additional projects are being developed and companies with other project ideas are encouraged to contact the private sector unit at the Ontario Women's Directorate.

Change Agent Projects

Westinghouse Canada Inc. — Two projects were developed by the Ontario Women's Directorate and Westinghouse Canada Inc. The first, the Career Development Workbook, encourages employers and supervisors to broaden their perception of female potential in the workplace. The second, the Risk Workshop encourages women to confront the challenges often associated with career development or change.

The Consumers' Gas Company Ltd. — The company chronicled its co-operative joint union/management problem-solving process aimed at increasing the number of women employed in the non-traditional job of service fitter. The company's experience has been turned into a case study.

The Canadian Manufacturers' Association — A workbook entitled *Employment Equity for Women — How Does Your Company Measure Up?* was written as a practical first step to help companies assess their performance in the area of employment equity. The workbook format encourages a "hands-on" approach that enables companies to review key policies and practices.

The Oshawa Group — A 22-minute employment equity management training video — *An Even Break* — was produced through this joint venture. The video illustrates some of the barriers that women, persons with disabilities and visible minorities may experience in gaining access to employment opportunities. It provides some practical solutions that managers or supervisors in any workplace could implement to remove barriers to the equal participation of all groups in society.

Sentinel Paving and Construction Limited — This company's successful experience in recruiting, hiring and integrating women for non-traditional jobs in a small road paving company has been recorded in a case study.

The National Association for Women in Construction — This association has developed a handbook for both women wishing to enter the construction industry and for industry employers. *Women Into Construction —A Blueprint for Action* provides employers with information about how to attract, recruit, hire and retain employees. It helps women learn where to seek, and train for, employment in construction and what groups exist to support them in this field.

Suncor Inc. — Suncor has established a process to increase the number of women in non-traditional jobs in the refinery and has documented this process so that their experience can help other companies. A recruitment film has also been produced to assist in hiring natives, women and visible minorities in the refinery.

(N.B. The project materials mentioned above are available through the Ontario Women's Directorate.)

Public Sector Programs

In the broader public sector, the directorate established the Employment Equity Incentive Fund to accelerate the take-up of employment equity in municipalities, hospitals, school boards, and universities. The results of the incentive fund are encouraging. The number of school boards with employment equity initiatives increased to 79 from 19; the number of municipalities to 23 from five; hospitals to 72 from zero; and universities to 15 from six.

To date, there have also been several special initiatives in hospitals and municipalities:

Sunnybrook Medical Centre has developed a "How To" outline on establishing employment-equity-sensitive human resource information systems. It will be distributed to Ontario hospitals.

Women's College Hospital has produced a guide to the development of bias-free interviews, performance appraisals, and career counselling. This career plan will be distributed to all female hospital employees.

Ottawa Civic Hospital has produced a guide to the development of job descriptions, bias-free interviews, performance appraisals, and career counselling. The career plan will be distributed to all female hospital employees.

Kingston General Hospital has developed a "How To" approach to the development of Staff Education Programs and a communications strategy. They will be distributed to all Ontario hospitals.

Penetanguishene General Hospital has developed a regional employment equity program for all Ontario hospitals.

The Municipality of Metropolitan Toronto is developing a goals-and-timetable model. It also plans to produce a guide for increasing the low representation of women in non-traditional occupations. Both projects will serve as guides for other municipalities that are implementing employment equity.

Other Programs

Workshops

The Ontario Women's Directorate provides two-and-a-half day Employment Equity Workshops for both private and broader public sector employers. Approximately 250 men and women have attended the workshops and currently use the training manual. The workshop and the manual provide more detailed information on implementing employment equity and expand on the material covered in the first five publications in this series.

Resource Networks

The Ontario Women's Directorate has developed several resource networks to keep human resource managers up to date on what is happening in employment equity in the private and public sectors. Separate networks have been established for the private sector, and for specific areas in the broader public sector — such as municipalities and school boards. Meetings are held several times a year. Contact the Ontario Women's Directorate for more information.

Appendix

Sample Policy for Sexual Harassment

Sexual harassment in any manner or form, or by any employee is expressly prohibited by (the organization) and, in some civil jurisdictions, by law.

(The organization) defines sexual harassment as unwelcome sexual advances, requests for sexual favours or other verbal or physical conduct of a sexual nature when:

- submission to such conduct is made either implicitly or explicitly a condition of employment;
- submission to or rejection of such conduct is used as a basis for any employment decisions (including promotional, salary, separation affecting the employee);
- such conduct has the purpose, or the effect, of unreasonably interfering with the employee's work performance or creating an intimidating, hostile or offensive work environment.

Management is responsible for communicating to all employees that sexual harassment is prohibited by (organization) policy; that a confidential complaint procedure exists for reporting sexual harassment; and that management will promptly investigate alleged incidents of sexual harassment and take appropriate corrective action.

All employees are responsible for promptly reporting any incidents that they believe to be sexual harassment. Complaints can be reported confidentially to designated authorities following the Sexual Harassment Complaint Procedure.

Records of complaints including contents of meetings, interviews, results of investigations and other material attendant to the claim should be collected and stored in a sealed envelope under separate cover to ensure confidentiality.

For additional information contact the Human Resource Department.

Sample Sexual Harassment Complaint Procedures

1. Any complaint involving sexual harassment should be outlined either verbally or in writing to one of two designated authorities with (the company). The Personnel Manager is one of the two.
2. The designated authority, along with a second person selected by the designated authority, will be responsible for investigating the specific complaint.
3. The team will advise both the complainant, the person implicated in the complaint and their next two levels of managers that an investigation has begun. The team may also recommend appropriate interim action.
4. The team will be responsible for establishing the facts.
5. The team will summarize their findings and reach a decision on recommended action by consensus. Written results of the investigation and a suggested resolution of the situation will then be presented by the two parties.
6. Should the situation not be resolved at this point, the team's recommendations will be shared with, and acted upon, at the appropriate level of management.
7. A follow-up will be conducted by the designated authority within three months after the investigation.

Exerpted from: The Canadian Manufacturers' Association and the Ontario Women's Directorate. Employment Equity for Women — How Does Your Company Measure Up? December 1986.

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Resources

Ontario Women's Directorate Consultative Services Branch

The Ontario Women's Directorate is the agency in the Ontario government that co-ordinates the development and communication of programs and policies for women. Its aim is economic and social equality for women in Ontario.

The Consultative Services Branch of the directorate specializes in the area of employment equity. It is responsible for encouraging the planning, development and expansion of employment equity programs in Ontario's public and private sectors.

In order to achieve this goal, the branch provides a wide range of consulting services to employers who are either just beginning to initiate employment equity programs, or who wish to enlarge those that are already established. Consultants offer employment equity strategies that are tailored to the organization's particular environment.

The services that this branch offers include:

- Workshops and seminars
- Technical guides and information
- Videos
- Advice on relevant legislation and government policies
- Opportunities to exchange ideas with other employers through networks and demonstration projects
- Recognition of success through annual awards in employer excellence

For further information, contact:
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Publications in this Series

Managing Employment Equity

- Introduction to a Series
- An Overview
- Organizational Analysis
- Organizational Change and Impact
- Legislation — A Guide for Employers
- Employment Equity Initiatives

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